

# EXHIBIT 1

Hill, Kertscher & Wharton, LLP  
 3350 Riverwood Parkway SE  
 Suite 800  
 Atlanta, GA 30339  
 Tax ID: 20-0568538

Invoice submitted to:  
 Paul Willoughby

May 02, 2016

In Reference To: Our File Number: 4-1721  
 Willoughby et. al. v. Youth Villages

Invoice #22832

Professional Services

			<u>Hrs/Rate</u>	<u>Amount</u>
9/1/2013	DRK	Meeting with potential clients; discussion of future actions, discovery needed, key witnesses and documents, and future actions.	4.50 400.00/hr	1,800.00
9/5/2013	JB	Legal research on the fww and whether failure to properly calculate the regular rate prevents there from being a clear mutual understanding	3.00 250.00/hr	750.00
9/6/2013	JB	Continue legal research on the fww and whether failure to properly calculate the regular rate prevents there from being a clear mutual understanding	4.00 250.00/hr	1,000.00
9/9/2013	JB	Continue legal research on the fww and whether failure to properly calculate the regular rate prevents there from being a clear mutual understanding	2.00 250.00/hr	500.00
9/11/2013	JB	Finalize legal research on FWW and prepare a memo summarizing the same	1.00 250.00/hr	250.00
9/15/2013	DRK	review of JB research and meeting with JB re outlining complaint.	1.30 400.00/hr	520.00
9/16/2013	JB	Begin drafting complaint	0.50 250.00/hr	125.00
9/17/2013	PAR	Called Esquire Court Reporting to get transcript of July 19th depo	0.10 85.00/hr	8.50

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		<u>Hrs/Rate</u>	<u>Amount</u>
9/18/2013	JB Continue drafting complaint (.3); confer with DRK regarding strategy for drafting complaint (.3); draft additional questions to clients to use in drafting the complaint (.4)	1.00 250.00/hr	250.00
9/23/2013	JB Review and analyze recent Northern District of Illinois opinion relating to fww and draft a summary of the same	0.80 250.00/hr	200.00
9/25/2013	DRK Preparation of questionnaires for clients to fill out (1.0); edit of first draft of complaint and return to JB with comments (1.0)	2.00 400.00/hr	800.00
9/27/2013	JB Draft follow-up correspondence to clients regarding completion of questionnaire	0.10 250.00/hr	25.00
9/30/2013	JB Review and respond to correspondence from Paul Slough regarding completion of questionnaire (0.1); continue to draft complaint (0.5)	0.60 250.00/hr	150.00
10/22/2013	JB Continue to prepare complaint	1.50 250.00/hr	375.00
10/23/2013	JB Continue to prepare complaint (2.0); legal research on the scope of non-profit covered enterprises and covered individuals (2.5)	4.50 250.00/hr	1,125.00
	JB Review and analyze Lamonica v. Safe Hurricane Shutters, Inc. a 2013 11th Circuit opinion to determine whether it affects our case and draft a summary of the same	0.50 250.00/hr	125.00
10/28/2013	JB Research proper division to file complaint	0.30 250.00/hr	75.00
11/19/2013	DRK final review and edit of complaint.	1.50 400.00/hr	600.00
11/20/2013	JB Revise and edit complaint and prepare the same for filing	1.00 250.00/hr	250.00
11/22/2013	JB Review and analyze complaint and case initiating documents to prepare for filing (.5); research proper registered agent and/or officer for service (1.0)	1.50 250.00/hr	375.00
12/2/2013	JB Review and analyze instructions for cases assigned to Judge Jones	0.10 250.00/hr	25.00
1/6/2014	JB Review and analyze attorney withdraw notice and correspondence from new counsel and update file accordingly	0.10 250.00/hr	25.00
1/9/2014	JB Review and analyze Defendants answer and prepare a summary of the same	0.60 250.00/hr	150.00
1/17/2014	JB Review and analyze answer (.3); review and analyze local rules to determine various scheduling deadlines (.3); draft correspondence to opposing counsel regarding scheduling Rule 26(f) conference (.4)	1.00 250.00/hr	250.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
1/20/2014	JB Review and respond to correspondence with opposing counsel regarding Rule 26(f) conference	0.10 250.00/hr	25.00
1/21/2014	JB Review and analyze file to prepare for 26(f) conference	0.50 250.00/hr	125.00
1/22/2014	TO Prepared Armstead overtime calculations.	0.60 115.00/hr	69.00
1/23/2014	JB Review and analyze answer (.3); review joint preliminary planning report (.4); legal research on defendants affirmative defenses in order to prepare for Rule 26(f) conference (1.0)	1.70 250.00/hr	425.00
	DRK conf. with JB, review and edit of JPPR; outline of discovery plan; call with Willoughby	1.70 400.00/hr	680.00
1/24/2014	JB Prepare for settlement conference by reviewing and analyze complaint, defendants answer, related case law, read prior court opinions involving Youth Villages	3.00 250.00/hr	750.00
	JB Phone call and various correspondence with opposing counsel regarding Rule 26(f) conference	0.30 250.00/hr	75.00
	JB Prepare Joint Preliminary Planning Report	1.50 250.00/hr	375.00
	JB Begin to prepare Plaintiffs initial disclosures	0.50 250.00/hr	125.00
	JB Begin to prepare Plaintiffs motion for conditional certification	0.50 250.00/hr	125.00
	JB Begin drafting Plaintiffs first requests for production of documents	0.50 250.00/hr	125.00
1/28/2014	JB Draft and respond to multiple correspondence to opposing counsel regarding 26(f) conference and JPR (.2); research revisions to JPR regarding ESI (.3)	0.50 250.00/hr	125.00
1/29/2014	JB Review and analyze pleadings in previous FLSA litigation against Youth Villages to assess likely defense strategy	2.50 250.00/hr	625.00
1/30/2014	JB Review and analyze pleadings in previous FLSA litigation against Youth Villages to assess likely defense strategy	2.50 250.00/hr	625.00
	JB Continue preparing Plaintiffs first discovery requests	2.00 250.00/hr	500.00
2/3/2014	JB Confer with DRK on the status of the case and prepare correspondence to opposing counsel regarding joint preliminary planning report	0.30 250.00/hr	75.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
2/3/2014	JB Continue to prepare initial disclosures (2.0); research prior litigation involving Youth Villages (1.0)	3.00 250.00/hr	750.00
2/4/2014	JB Review and analyze Defendants revisions to the JPR, confer with DRK regarding the same, and begin to prepare a revised draft of the JPR	1.00 250.00/hr	250.00
	JB Continue drafting Plaintiffs first requests for production of documents	1.00 250.00/hr	250.00
	JB Legal research on previous FLSA cases in from of Judge Steve Jones and any review any related opinions and briefs related to a motion for certification of a collective action	3.00 250.00/hr	750.00
	JB Legal research on the legal standard for a motion for certification of a collective action and begin drafting the same	2.00 250.00/hr	500.00
2/5/2014	JB Phone calls with clients regarding information for the initial disclosures and collective action certification and prepare a summary of the same (.8); gather documents to produce in response to the initial disclosures (.7); legal research on the discoverability of social media when mental state is not at issue (3.0); prepare for 26(f) call; continue to revise RPDs (2.0)	6.50 250.00/hr	1,625.00
2/6/2014	JB Continue to prepare motion for conditional certification	2.60 250.00/hr	650.00
	JB Legal research on whether a shift employee that arrives early or stays late is entitled to be compensated for the time outside of the scheduled shift	1.00 250.00/hr	250.00
	JB Phone interview with potential plaintiff Jamie Stephenson and prepare a summary of the same	0.50 250.00/hr	125.00
	JB Prepare for and conduct 26(f) conference with opposing counsel and update JPR to reflect discussions from the conference	0.80 250.00/hr	200.00
	JB Begin to prepare 30(b)(6) deposition topics	1.60 250.00/hr	400.00
	JB Continue to revise Plaintiffs first requests for production of documents	0.70 250.00/hr	175.00
2/7/2014	JB Continue to review and revise the Joint Preliminary Planning Report	0.40 250.00/hr	100.00
	JB Prepare Stephenson consent form	0.40 250.00/hr	100.00
	JB Continue to prepare motion for conditional certification including preparing affidavits for each client and preparing proposing notice of action and consent	3.50 250.00/hr	875.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
2/8/2014	DRK Lengty Calls with Jamie Stephenson re issues he is upset about (1.0); edit and comment on conditional certification motion (1.0); additional research to insert into same (1.5)	3.50 400.00/hr	1,400.00
2/9/2014	JB Review and respond to various correspondence from Jamie Stephenson and phone call with DRK regarding the same	0.50 250.00/hr	125.00
2/10/2014	JB Revise joint preliminary planning report and prepare for filing	0.30 250.00/hr	75.00
	JB Continue to prepare initial disclosures	1.20 250.00/hr	300.00
	JB Continue to draft and revise 30(b)(6) deposition topics	0.50 250.00/hr	125.00
	JB Continue to draft and revise first requests for production of documents	0.30 250.00/hr	75.00
	JB Prepare Plaintiffs first interrogatories to Defendant	1.00 250.00/hr	250.00
	JB Revise and edit motion for conditional certification	1.00 250.00/hr	250.00
	JB Phone call to David Thompson regarding litigation; phone call to Phillip White regarding litigation	0.50 250.00/hr	125.00
2/11/2014	JB Draft correspondence to opposing counsel regarding scheduling depositions (.1); draft correspondence to DRK regarding finalizing initial disclosures and strategy for depositions (.1); confer with GM regarding receipt of Mr. Daviss declaration (.1); draft correspondence to Mr. Davis regarding receipt of declaration (.2)	0.50 250.00/hr	125.00
2/12/2014	JB Review and analyze signed Willoughby declaration and respond to correspondence from the client regarding the same	0.30 250.00/hr	75.00
2/13/2014	JB Phone call with Phillip White regarding FLSA litigation (.2); phone call with Phillip Davis regarding declaration in support of motion for conditional certification (.3); prepare packet of various correspondence to Phillip White draft correspondence to opposing counsel regarding deposition scheduling (.5); phone call with David Thompsons (.2); prepare initial disclosures for filing (.3)	1.50 250.00/hr	375.00
2/14/2014	SC Prepared letter for JB regarding fee contract and consent form.	0.10 85.00/hr	8.50
	JB Revise and edit motion for conditional certification	3.00 250.00/hr	750.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
2/17/2014	JB	Continue to revise and edit motion for conditional certification (.3); phone call with Jamie Stephenson regarding case (.3); review correspondence from Jamie Stephenson (.4)	1.00 250.00/hr 250.00
2/18/2014	JB	Prepare for David Thompson interview; phone call with Jamie Stephenson; confer with DRK regarding motion for conditional certification	0.70 250.00/hr 175.00
	DRK	edit of motion for conditional certification (2.3); preparation of new declaration needed for same (2.0); o/c with JB re same (.5)	4.80 400.00/hr 1,920.00
2/19/2014	JB	Review and respond to correspondence with opposing counsel regarding deposition scheduling; update DRK regarding the same	0.30 250.00/hr 75.00
	JB	Phone calls to Phillip White and Chrystal Foster-Gadsden regarding litigation	0.20 250.00/hr 50.00
2/21/2014	JB	Phone calls to Phillip Davis and Crystal Fister-Gadsden regarding litigation	0.20 250.00/hr 50.00
2/24/2014	JB	Revise and finalize motion for conditional certification	1.30 250.00/hr 325.00
	JB	Prepare correspondence to clients regarding discovery and status of the litigation	0.30 250.00/hr 75.00
	JB	Review and analyze defendants discovery requests, create a chart regarding the same to organize plaintiffs responses (1.0); prepare correspondence to clients regarding the same (.2); prepare correspondence to clients regarding party-plaintiff consents (.3)	1.50 250.00/hr 375.00
2/27/2014	JB	Review and respond to various correspondence with opposing counsel and regarding discovery and deposition scheduling (.2); research legal standard to remove based upon newly acquired damages evidence (.3)	0.50 250.00/hr 125.00
3/3/2014	JB	Review and analyze file to determine necessary future actions; prepare correspondence to opposing counsel regarding initial disclosures	0.30 250.00/hr 75.00
	JB	Review prior Youth Villages litigation to assess possible defenses (.2); confer with DRK regarding litigation strategy (.5); prepare correspondence to opposing counsel regarding deposition schedule (.3)	1.00 250.00/hr 250.00
	DRK	Conference with JB re status, future actions, strategic planning	0.50 400.00/hr 200.00
3/5/2014	JB	Review and respond to various correspondence with opposing counsel regarding method of service and initial disclosure deficiency and follow-up regarding the same	0.40 250.00/hr 100.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
3/6/2014	SC	I contacted Mr. Willoughby and Ms. Foster to discuss their availability for a deposition. I also asked if they received the discovery responses and set up a time when JB could speak with them about the case.	0.50 85.00/hr 42.50
	JB	Various correspondence to coordinate plaintiffs deposition schedule and confer with SC regarding the same	0.40 250.00/hr 100.00
3/11/2014	SC	Placed a follow up call with Mr. Davis in regards to scheduling his upcoming deposition. I was unable to reach him so I prepared a letter asking him to contact our offices to discuss his case and to update his contact information with us.	0.60 85.00/hr 51.00
	JB	Prepare motion to add Jamie Stephenson as a party plaintiff	1.10 250.00/hr 275.00
3/12/2014	JB	Phone call with Phillip Davis regarding deposition	0.10 250.00/hr 25.00
	JB	Prepare correspondence to opposing counsel regarding discovery (.3); review and respond to various correspondence with Jamie Stephenson (.4); continue to edit motion to add Jamie Stephenson as a party plaintiff (1.0)	1.70 250.00/hr 425.00
3/13/2014	JB	Begin to prepare responses and objections to defendants discovery requests	1.30 250.00/hr 325.00
3/14/2014	JB	Legal research on employers duty to preserve time records; legal research on fluctuating workweek decisions nationally within the last 6mths	1.50 250.00/hr 375.00
	JB	Continue to prepare responses and objections to defendants discovery interrogatories, requests for production of documents and request for admission to three plaintiffs	3.50 250.00/hr 875.00
	JB	Revise and edit motion to add Jamie Stephenson as a party plaintiff	0.50 250.00/hr 125.00
	JB	Review and analyze Defendants response in opposition to Plaintiffs motion for conditional certification and read the legal opinions cited in the same (1.0); begin drafting reply brief in support of motion for conditional certification (2.5)	3.50 250.00/hr 875.00
3/17/2014	JB	Continue to prepare responses and objections to defendants discovery requests (.7); phone calls to each client regarding discovery responses (.3)	1.00 250.00/hr 250.00
	JB	Revise motion to amend to add party plaintiff and file the same	1.30 250.00/hr 325.00
	JB	Continue to prepare reply brief in support of motion for conditional certification	1.30 250.00/hr 325.00



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		<u>Hrs/Rate</u>	<u>Amount</u>
3/18/2014	SC Per JB's request I compared the defendant's answer to its amended answer and described the differences between the numbered paragraphs and sent her a detailed outline of my findings.	1.50 85.00/hr	127.50
	JB Continue to prepare reply brief in support of motion for conditional certification (2); meeting with Paul Willoughby regarding responses to discovery requests (1.5); phone call with Cyrstal Foster-Gadsden regarding responses to discovery requests (0.5); prepare declaration of Paul Willoughby in support of motion for conditional certification (0.3)	4.30 250.00/hr	1,075.00
	DRK review of Defendants' response in opposition to conditional certification briefs (.8); edit of reply brief drafted by JB (3.0)	3.80 400.00/hr	1,520.00
3/21/2014	JB Continue to prepare reply in support of motion for conditional certification	2.00 250.00/hr	500.00
3/22/2014	JB Continue to prepare reply in support of motion for conditional certification	1.50 250.00/hr	375.00
3/24/2014	JB Continue to draft and revise reply in support of motion for conditional certification	2.30 250.00/hr	575.00
3/25/2014	JB Continue to revise and edit reply in support of motion for conditional certification	0.50 250.00/hr	125.00
	JB Continue to prepare responses and objections to defendants discovery requests; confer with DRK regarding discovery responses and reply brief	0.80 250.00/hr	200.00
	JB Meeting with Phillip Davis regarding discovery responses	0.70 250.00/hr	175.00
	JB Meeting with Paul Willoughby regarding discovery responses	1.50 250.00/hr	375.00
	JB Phone call to Crystal Foster-Gadsden regarding discovery responses	0.10 250.00/hr	25.00
3/26/2014	SC Mailed Mr. White a fee agreement, questionnaire, and consent form packet for his review and signature.	0.30 85.00/hr	25.50
	JB Confer with DRK regarding status of the litigation; phone call to Jamie Stephenson regarding the same	0.30 250.00/hr	75.00
3/27/2014	JB Revise and edit reply in support of motion for conditional certification; phone call with Jamie Stephenson regarding status of the litigation	1.00 250.00/hr	250.00
3/31/2014	JB Prepare discovery responses for Paul Willoughby including process responsive documents (3); prepare discovery responses for Phillip Davis (1.5); prepare discovery responses for Crystal Foster-Gadsden (1.5)	6.00 250.00/hr	1,500.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
4/2/2014	JB Review and analyze defendants response in opposition to add JS as a party-plaintiff (4.1); legal research on the case law cited by Defendant (1.0)	5.10 250.00/hr	1,275.00
4/3/2014	JB Continue to prepare reply brief in support of motion to amend to add Jamie Stephenson	2.50 250.00/hr	625.00
4/8/2014	JB Review and analyze Defendants responses to plaintiffs interrogatories and requests for production of documents and prepare charts summarizing the same	2.00 250.00/hr	500.00
	DRK Review and edit of draft brief prepared by JB in opposition to summary judgment (2.0); review and edit of SMF (1.2)	3.20 400.00/hr	1,280.00
4/9/2014	JB Review and analyze documents produced by Phillip Davis for responsiveness and privilege	0.40 250.00/hr	100.00
	JB Prepare for depositions of defendants	1.00 250.00/hr	250.00
	JB Legal research on standards to determine if a position is exempt under the FLSA	2.50 250.00/hr	625.00
	JB Prepare consent to withdraw documents for Cyrstal Foster-Gadsden (.3); meeting regarding the same (.2); phone call and correspondence with opposing counsel regarding the same (.2)	0.70 250.00/hr	175.00
	JB Bates label documents from Phillip Davis and prepare correspondence to opposing counsel regarding supplemental production	0.20 250.00/hr	50.00
	JB Phone call to clients to schedule deposition prep meetings	0.20 250.00/hr	50.00
	JB Legal research on fluctuating workweek prerequisites in order to prepare for depositions	3.70 250.00/hr	925.00
4/10/2014	JB Phone call with opposing counsel regarding deposition schedule and prepare various correspondence to clients regarding the same	0.20 250.00/hr	50.00
4/11/2014	SC Per JB's request I saved documents from a CD, printed the documents and created a folder for the file.	0.60 85.00/hr	51.00
	JB Continue to review and analyze documents produced by defendant; begin to create excel sheet of Phillip Daviss payroll	3.70 250.00/hr	925.00
4/14/2014	JB Continue to prepare reply in support of motion to amend to add Jamie Stephenson as a party plaintiff	1.70 250.00/hr	425.00
4/15/2014	JB Continue to revise and edit reply in support of motion to amend and prepare for filing	0.70 250.00/hr	175.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
4/15/2014	JB Continue to review defendants document production and prepare for depositions	2.70 250.00/hr	675.00
4/16/2014	JB Continue to review Defendants document production to prepare for depositions and prepare discovery deficiency letter	4.00 250.00/hr	1,000.00
4/17/2014	JB Continue to prepare to for client deposition prep meeting; continue to prepare outline for depositions of Youth Villages employees	3.00 250.00/hr	750.00
4/18/2014	JB Meeting with Phillip Davis regarding deposition (1.5); meeting with Jamie Stephenson regarding deposition of current Youth Villages employees (1.5); continue to prepare and revise outline of depositions of Youth Villages employees (1); prepare excel sheet of time worked and money paid to Paul Willoughby to assess FWW compliance and damages (2)	6.00 250.00/hr	1,500.00
4/19/2014	DRK meeting with Jamie Stephenson re deposition preparation, future actions	3.00 400.00/hr	1,200.00
4/21/2014	JB Prepare for meeting with Paul Willoughby regarding deposition preparation (.1); phone call to Kelly Carlson regarding deposition (.1)	0.20 250.00/hr	50.00
	JB Meeting with Paul Willoughby to prepare for clients deposition	2.10 250.00/hr	525.00
	JB Prepare witnesses checks pursuant to Rule 45 and prepare correspondence to opposing counsel regarding the same	0.40 250.00/hr	100.00
	JB Review and respond to multiple correspondence with opposing counsel regarding status of depositions, employees and managers and requirement for subpoena	0.40 250.00/hr	100.00
4/22/2014	JB Prepare for depositions of Mr. Booze and Mr. Graham	2.50 250.00/hr	625.00
	DRK Preparation for Booze deposition, including review of key documents and key payroll and testimony.	2.50 400.00/hr	1,000.00
4/23/2014	JB Prepare for, attend and take deposition of William Booze	4.00 250.00/hr	1,000.00
	JB Phone call to Paul Willoughby regarding deposition preparation	0.10 250.00/hr	25.00
	JB Prepare summary of deposition of Mr. Graham	0.20 250.00/hr	50.00
	JB Prepare and take deposition of Mr. Byron Graham	3.00 250.00/hr	750.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
4/23/2014	DRK Taking of W. Booze deposition, and brief discussions with Jim Mulroy re status, future actions.	3.80 400.00/hr	1,520.00
4/24/2014	JB Prepare for and defend deposition of Paul Willoughby	5.30 250.00/hr	1,325.00
	JB Prepare for and take deposition of David Thompson	2.00 250.00/hr	500.00
	JB Prepare summary of todays depositions	0.20 250.00/hr	50.00
	JB Phone call with Mr. Stephenson regarding depositions	0.20 250.00/hr	50.00
4/25/2014	JB Prepare for and defend deposition of Phillip Davis	3.50 250.00/hr	875.00
	JB Prepare summary of Mr. Daviss deposition and prepare outline of future litigation strategy	0.30 250.00/hr	75.00
	JB Review and analyze clients time card audit trail in order to determine in time records were altered and calculate estimated damages	2.00 250.00/hr	500.00
4/28/2014	JB Prepare correspondence to each client regarding additional potential plaintiffs (.5); prepare withdraw of Foster-Gadsden (.1); phone call to Phillip White regarding participation (.2); legal research on the standards for spoliation (.7); prepare Rule 37 discovery deficiency letter (.5)	2.00 250.00/hr	500.00
4/29/2014	JB Revise and edit voluntary withdraw of Foster-Gadsden	0.20 250.00/hr	50.00
	JB Prepare rule 37 discovery deficiency letter (.8); prepare second RPDs to Defendants (1.2); research the various reports that Kronos is able to generate (2.0)	4.00 250.00/hr	1,000.00
4/30/2014	JB Revise and edit Rule 37 discovery deficiency letter (.7); revise Plaintiffs second requests for production of documents (.8)	1.50 250.00/hr	375.00
	JB Review and analyze filing notifications regarding closure of the case and call the clerk regarding the same	0.20 250.00/hr	50.00
5/1/2014	JB Phone calls to prospective plaintiffs and create a chart organizing information regarding the same	0.40 250.00/hr	100.00
5/8/2014	JB Legal research on the 11th Circuits standards for proving time worked in off-the-clock cases	0.20 250.00/hr	50.00
5/9/2014	JB Phone calls to prospective plaintiffs	1.60 250.00/hr	400.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
5/12/2014	JB Prepare supplemental response to affidavit of Sherry Kollmeyer; review and analyze deposition transcripts in order to prepare the same	0.50 250.00/hr	125.00
5/13/2014	JB Phone call with William Booze regarding litigation and participation in the same	0.90 250.00/hr	225.00
	JB Review and analyze proposed protective order	0.40 250.00/hr	100.00
	JB Phone calls to prospective plaintiffs	0.30 250.00/hr	75.00
	MD Review draft protective order and conference with JB re same.	0.20 275.00/hr	55.00
5/14/2014	JB Phone call to Markus Brown regarding joining the lawsuit	0.20 250.00/hr	50.00
	JB Phone call with Amber Davis regarding litigation and participation in the same; prepare consent and attorney fee contract for Ms. Davis	1.00 250.00/hr	250.00
	JB Revise proposed protective order	1.00 250.00/hr	250.00
	JB Phone call to Marian Phillips regarding her employment with Youth Villages and investigation as a fact witness	0.50 250.00/hr	125.00
5/19/2014	JB Legal research on case law regarding relation back of opt-ins	0.20 250.00/hr	50.00
	JB Phone call with Byron Graham regarding participation in the litigation	0.40 250.00/hr	100.00
5/20/2014	SC I called Mr. Brown, Mr. Simms, and Ms. Davis to confirm their appointments for Wednesday, May 21, 2014.	0.10 85.00/hr	8.50
	JB Meeting with ZK regarding case and to discuss creating a chart of the FWW violations and damages estimations	1.00 250.00/hr	250.00
	JB Prepare for prospective client meetings	0.80 250.00/hr	200.00
	ZK Reading statutes, organizing time sheets.	3.80 150.00/hr	570.00
5/21/2014	JB Phone calls to various prospective clients	0.20 250.00/hr	50.00
	JB Meeting with J. Simms regarding consent to join the lawsuit; phone calls to various prospective plaintiffs; review and analyze defendants settlement offer correspondence	1.80 250.00/hr	450.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
5/21/2014	JB Meeting with Amber Davis regarding joining the lawsuit (.2); meeting with Fannie Cham regarding joining the lawsuit (.2); finalize consents and attorney fee contracts regarding he same (.1)	0.50 250.00/hr	125.00
	JB Prepare for prospective client meeting with Markus Brown; meeting with Markus Brown	0.50 250.00/hr	125.00
	JB Confer with ZK regarding Time Card Audit Trail and retention of a Kronos consultant	0.30 250.00/hr	75.00
	JB Phone call with Jason regarding lawsuit and participation in the same; prepare consent and cover letter regarding the same	0.50 250.00/hr	125.00
	JB Phone call with Golden Smith regarding participation in the lawsuit; prepare email correspondence and consent regarding the same	0.40 250.00/hr	100.00
	JB Review and respond to correspondence from opposing counsel regarding missing time and payroll information.2	0.40 250.00/hr	100.00
	JB Prepare separate correspondence to clients regarding settlement offers from Youth Villages	0.40 250.00/hr	100.00
	ZK Reviewing audit trails, finding consultant, creating excel sheet.	3.10 150.00/hr	465.00
	ZK Rechecking missing discovery documents.	0.60 150.00/hr	90.00
5/22/2014	ZK Creating Phillip Davis spreadsheet.	2.70 150.00/hr	405.00
	ZK Working on Davis spreadsheet.	1.90 150.00/hr	285.00
	ZK Research re: PTO credit.	1.00 150.00/hr	150.00
5/23/2014	JB Prepare supplement in support of motion for conditional certification by reviewing relevant deposition transcriptions, drafting said motion and gathering exhibits	4.30 250.00/hr	1,075.00
	JB Phone call with Chasity Banks regarding participation in the lawsuit; prepare correspondence and consent regarding the same	0.40 250.00/hr	100.00
	ZK Research re: offsets.	1.20 150.00/hr	180.00
	ZK Standard for leave to file supplement.	0.50 150.00/hr	75.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
5/23/2014	ZK Starting memo re: settlement offer.	1.30 150.00/hr	195.00
	ZK Research re: work credits.	0.40 150.00/hr	60.00
	ZK Research re: work credits.	2.00 150.00/hr	300.00
5/24/2014	JB Revise and edit motion for protective order	0.40 250.00/hr	100.00
	JB Revise and edit motion for leave to file supplemental briefing	0.60 250.00/hr	150.00
5/27/2014	JB Phone call with T. Armstead regarding participation in the law suit; prepare correspondence regarding consent form and attorney fee contract	0.40 250.00/hr	100.00
	ZK Inputting spreadsheet data.	3.00 150.00/hr	450.00
	ZK Inputting spreadsheet data.	4.20 150.00/hr	630.00
	ZK Research and writing memo.	0.30 150.00/hr	45.00
5/28/2014	JB Phone call with Phillip Davis regarding meeting	0.10 250.00/hr	25.00
	ZK Writing memo re: demand letter.	1.50 150.00/hr	225.00
5/29/2014	JB Phone call with Kyle Hoxie regarding participation in lawsuit; prepare cover letter and consents regarding the same; coordinate with SC regarding contacting outstanding prospective clients	0.80 250.00/hr	200.00
	ZK Inputting spreadsheet data.	0.70 150.00/hr	105.00
	SC Per JB's request I called Mr. White, Mr. Graham, Mr. Booze, Mr. Marcus Brown, Mr. Burgess, and Ms. Banks to follow up on the Youth Villages Overtime Litigation Paperwork (consent form and attorney fee contract). I re-sent the consent form and attorney fee contract to Mr. White and Br. Burgess.	0.30 85.00/hr	25.50
5/30/2014	JB Prepare for meeting with Phillip Davis (0.5); meeting with Phillip Davis to discuss settlement offer(0.4)	0.90 250.00/hr	225.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
5/30/2014	JB Revise and edit motion for leave to file supplemental briefing	0.70 250.00/hr	175.00
6/2/2014	ZK Data entry.	2.20 150.00/hr	330.00
	JB Phone call with S. Brinkley regarding participation in the lawsuit; prepare correspondence regarding fee contract and consent for the same	0.40 250.00/hr	100.00
6/3/2014	JB Prepare T. Armstead consent for filing	0.20 250.00/hr	50.00
	JB Phone call with K. Hoxie regarding participation in the suit	0.10 250.00/hr	25.00
	JB Review and analyze defendants responses to Plaintiffs second RPDs (1.0); review and analyze Defendants supplemental document production (.6); review and respond to Defendants response to Plaintiffs Rule 37 letter regarding the 1st RPDs (1.0)	2.60 250.00/hr	650.00
	JB Legal research on whether plaintiffs can engage in class-wide discovery before conditional certification is granted in order to prepare Rule 37 correspondence	1.10 250.00/hr	275.00
6/4/2014	ZK Finding kronos expert.	0.40 150.00/hr	60.00
	JB Phone call with Terance Armstead regarding consent form	0.20 250.00/hr	50.00
	JB Prepare documents for Kronos consultant; phone call with Kronos consultant	0.90 250.00/hr	225.00
	JB Prepare a response to Youth Villages correspondence alleging that Plaintiffs discovery responses are deficient	1.80 250.00/hr	450.00
6/6/2014	ZK Data entry.	2.00 150.00/hr	300.00
	DS Research re: work product discovery dispute.	2.50 150.00/hr	375.00
	JB Review and analyze recent document production from Defendant	1.00 250.00/hr	250.00
6/9/2014	ZK Reseach re: CoA for no breaks.	1.60 150.00/hr	240.00
	ZK Data entry.	2.50 150.00/hr	375.00



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			<u>Hrs/Rate</u>	<u>Amount</u>
6/9/2014	JB	Review and respond to various correspondence with Kronos consultant regarding scheduling phone call	0.10 250.00/hr	25.00
	JB	Phone call with Kronos consultant; review defendants document production of additional timecard audit reports	0.50 250.00/hr	125.00
6/10/2014	ZK	Data entry.	3.50 150.00/hr	525.00
	JB	Phone call with Paul Willoughby regarding his emails, text messages, and social media (.5); phone call with Phillip Davis regarding the same (.3); phone call with P. Davis regarding YV criminal action (2); continue to prepare response YV Rule 37 letter (1.7); continue to revise protective order (1.0)	3.70 250.00/hr	925.00
	JB	Legal research on an employers ability to claim credits including the categories of payments which can be credited and whether credits are limited to individual workweeks	0.70 250.00/hr	175.00
6/11/2014	SC	Per Julie's request I called the following individuals regarding their consent and fee contract; Mr. White, Mr. Brown, Ms. Banks, Ms. Brinkley, and Mr. Hoxie.	0.10 85.00/hr	8.50
	JB	Continue legal research on an employers ability to claim credits including the categories of payments which can be credited and whether credits are limited to individual workweeks	1.30 250.00/hr	325.00
	JB	Prepare follow-up correspondence to Youth Villages regarding deficiencies in their responses to Plaintiffs first request for production of documents	1.50 250.00/hr	375.00
	JB	Prepare correspondence to Youth Villages regarding deficiencies in their responses to Plaintiffs second request for production of documents	0.70 250.00/hr	175.00
	JB	Review and analyze time card audit trail of Mr. Stephensons time entries	1.10 250.00/hr	275.00
6/12/2014	JB	Continue to review and analyze time card audit trail of Mr. Stephensons time entries; continue to revise stipulated protective order; review and edit various discovery correspondence	1.40 250.00/hr	350.00
6/13/2014	JB	Review and analyze consents from K. Hoxie and M. Brown	0.10 250.00/hr	25.00
6/18/2014	ZK	Data input.	1.40 150.00/hr	210.00
6/19/2014	JB	Finalize response correspondence to opposing counsels rule 37 letter	0.40 250.00/hr	100.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
6/22/2014	JB	Review and analyze Defendants response to motion for leave to file supplemental briefing (0.2); begin to prepare reply in support of motion for leave to file supplemental briefing (0.5); review and analyze Defendants motion for partial summary judgment and exhibits and prepare a summary of the same to DRK (0.6)	1.30 250.00/hr 325.00
6/27/2014	JB	Phone call with W. Booze regarding work-related fall	0.20 250.00/hr 50.00
6/30/2014	JB	Continue to draft reply in support of motion for leave to file supplemental briefing in support of motion for conditional certification	2.60 250.00/hr 650.00
	JB	Begin to prepare Rule 56(d) motion regarding the need for additional time before responding to a motion for summary judgment	2.40 250.00/hr 600.00
7/1/2014	JB	Meet with CM regarding preparation of motion to compel and legal research regarding attorneys fees, litigated damages, and three year statute of limitations, and relation back of opt-ins	0.20 250.00/hr 50.00
	JB	Continue to draft response to Defendants motion for partial summary judgment pursuant to Rule 56(d)	0.80 250.00/hr 200.00
	CM	Review of discovery requests/responses.	1.30 150.00/hr 195.00
	CM	Research re: willfulness statute of limitations for liquidated damages/attorney fees.	1.40 150.00/hr 210.00
7/2/2014	JB	Continue to draft response to Defendants motion for partial summary judgment pursuant to Rule 56(d) and attorney declaration in support	2.80 250.00/hr 700.00
7/7/2014	JC	Assist JB with filing of 56(d) motion.	0.20 250.00/hr 50.00
	JB	Revise response to defendants motion for summary judgment pursuant to Rule 56(d); prepare supporting declaration of Julie Burke; prepare response for filing	3.30 250.00/hr 825.00
7/8/2014	JB	Phone calls to Phillip Davis and Byron Graham regarding status of the litigation	0.50 250.00/hr 125.00
	CM	Research availability of relation back doctrine for new opt-in plaintiffs and three year FLSA willfulness statute of limitations.	1.80 150.00/hr 270.00
7/9/2014	CM	Gathered case law supporting opt-in plaintiff's three year statute of limitations of the FLSA.	0.80 150.00/hr 120.00
	CM	Research case law on ability to compel disclosure of personal cell phone records where phones were used for some work-related communications.	3.20 150.00/hr 480.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
7/10/2014	JB	Confer with DRK regarding actions to take during the discovery period, strategy	0.50 250.00/hr	125.00
	DRK	office conf. with JB re strategy and future actions.	0.50 400.00/hr	200.00
7/11/2014	JB	Phone call with W. Booze regarding vacation time	0.10 250.00/hr	25.00
	CM	Draft third-party request for production of documents (cell phone communication records between manager and employee on personal phone) and downloaded N.D. Georgia subpoena form.	2.60 150.00/hr	390.00
	ZK	Research re: employer failing to allow employee to take two consecutive weeks of vacation time.	1.00 150.00/hr	150.00
7/15/2014	JB	Review and analyze multiple discovery correspondence from opposing counsel (.7); prepare supplemental interrogatory responses for P. Davis and P. Willoughby (1.0)	1.70 250.00/hr	425.00
7/17/2014	SC	Per Julie's request I called Mr. Davis and Mr. Willoughby re verification form they needed to sign and fax back to the office.	0.10 85.00/hr	8.50
	JB	Prepare litigation status update correspondence to J. Stephenson	0.10 250.00/hr	25.00
	JB	Finalize supplemental interrogatory responses for P. Willoughby and P. Davis (.2); prepare verifications for the same (.2); prepare correspondence to clients regarding review of interrogatory responses and verification (.3); confer with SC regarding coordinating interrogatory verifications (.1)	0.80 250.00/hr	200.00
7/18/2014	JB	Finalize supplemental interrogatory responses, interrogatory verifications and privilege log	0.30 250.00/hr	75.00
8/1/2014	JB	Confer with DRK regarding remaining needed discovery and strategy given proximate close of discovery	0.50 250.00/hr	125.00
	DRK	review and edit of discovery responses; confer with JB re future discovery and plan for same.	1.00 400.00/hr	400.00
8/5/2014	JB	Phone call with Fannie Cham regarding change of address and recent resignations	0.10 250.00/hr	25.00
8/6/2014	JB	Begin to prepare motion to extend discovery period	1.00 250.00/hr	250.00
8/7/2014	CM	Drafted memo discussing requirements to extend statute of limitations to 3 years via willfulness and ability of employer to assert good faith and avoid liquidated damages.	2.80 150.00/hr	420.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
8/7/2014	JB Prepare correspondence to opposing counsel regarding request for discovery extension	0.10 250.00/hr	25.00
8/8/2014	CM Drafted additional portion of memo assessing whether relation back doctrine can be used for opt-in plaintiffs to change tolling date (1.0); Additional research under ADEA to see if analogous case law existed (1.4)	2.40 150.00/hr	360.00
	JB Prepare consent motion to extend discovery	0.50 250.00/hr	125.00
	JB Phone call to B. Graham regarding litigation	0.10 250.00/hr	25.00
8/18/2014	JB Phone call with S. Brinkley regarding litigation status	0.10 250.00/hr	25.00
8/19/2014	JB Phone calls with S. Brinkley and F. Cham regarding litigation status	0.10 250.00/hr	25.00
9/10/2014	JB Prepare for phone call with E. Dowdell and update clients regarding the same	0.30 250.00/hr	75.00
10/3/2014	JB Review and analyze order on motion for conditional certification (.3); prepare litigation strategy in light of the order (.2); prepare correspondence to clients updating them on the same (.4); revise notice and consent per the Order (.5); conference with Douglas R. Kertscher re same (.6)	2.00 250.00/hr	500.00
	DRK review and analysis of good order on conditional certification (.2); conf. with JB re future actions (.6)	0.80 400.00/hr	320.00
10/6/2014	JB Review Courts summary Judgment Order	0.10 250.00/hr	25.00
	JB Prepare correspondence to clients updating on recent orders; prepare correspondence to DS regarding organizing client contact information	0.30 250.00/hr	75.00
10/7/2014	SC Per JB's request I created a chart of the clients that have currently filed a consent form. The chart included their names, addresses, email address, position, dates employed, unit.	0.30 85.00/hr	25.50
	JB Research recent Judge Story opinion on fluctuating workweek damages (.5); legal research on recent decisions nationally relating to fluctuating workweek (.5); review Judge Jones docket for FWW cases (.2)	1.20 250.00/hr	300.00
	JB Prepare correspondence to opposing counsel regarding various actions to be taken in light of conditional certification order (.3); prepare protective order per the Courts requirement (.4)	0.70 250.00/hr	175.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
10/10/2014	JB Review and analyze courts order granting Plaintiffs motion to amend to add Jamie Stephenson (.1); investigate caselaw cited by the court regarding relation back in order to prepare motion allowing opt-ins to relate back (.4)	0.50 250.00/hr	125.00
10/14/2014	JB Review and respond to correspondence from B. Graham regarding update	0.10 250.00/hr	25.00
10/15/2014	JB Review and analyze file to assess future actions, discovery and strategy (1.3); finalize conditional certification correspondence and protective order to opposing counsel (0.3); finalize discovery deficiency letter to opposing counsel and prepare second interrogatories (0.3)	1.90 250.00/hr	475.00
10/16/2014	JB Confer with opposing counsel regarding notice and consent and revise the same accordingly	0.20 250.00/hr	50.00
10/20/2014	JB Finalize correspondence to opposing counsel regarding supplementation of classwide discovery (.5); conduct office meeting regarding conditional certification process (1.0); prepare opt-in contact information mail merge (1.0)	2.50 250.00/hr	625.00
	JB Calculate P. Davis damages for settlement demand	2.80 250.00/hr	700.00
	SC Per JB's request I prepared and sent 310 letters re Final Notice and Consent.	11.00 85.00/hr	935.00
10/21/2014	JB Calculate J. Stephenson damages for settlement demand	0.90 250.00/hr	225.00
10/23/2014	JB Three phone calls with Mr. Armistis regarding participation in lawsuit; prepare welcome packet by reviewing fee contract and preparing a cover letter and updated questionnaire	1.50 250.00/hr	375.00
10/28/2014	JB Finalize welcome packet, including cover letter and questionnaire to opt-ins; confer with SC regarding opt-in process	0.50 250.00/hr	125.00
10/29/2014	JB Phone call with B. Artimus regarding lawsuit participation	0.10 250.00/hr	25.00
	JB Review signed consents and return incorrectly addressed notices	0.20 250.00/hr	50.00
11/20/2014	DRK call with Jim Mulroy re status, future actions; email to JB re same	0.50 400.00/hr	200.00
12/1/2014	SC Per JB's request I called Fannie Cham, Bernard Artumus, Jamie Stephenson, Lamar Hayes, Benjamin Creekmore, and Steven Ventre to inform them that they are being deposed and to set up the date and time of their depositions. I also sent each one of them an email confirming their deposition times and the notice of depostion.	0.40 85.00/hr	34.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
12/1/2014	JB Phone calls with opt-ins regarding scheduling depositions (.5); revise motion for discovery extension; revise opt-in mediation notice letter (.7); prepare motion for discovery extension for filing and confer with opposing counsel regarding revisions (.2); multiple communications regarding mediation status (.2)	1.60 250.00/hr	400.00
	DRK multiple emails to/from o/c re status, future actions; call from clients re status, answering their questions.	1.00 400.00/hr	400.00
12/2/2014	JB Schedule opt-in depositions (.2); confer with DRK regarding mediation status and strategy (.3)	0.50 250.00/hr	125.00
	DRK Meeting with JB (.3); call from clients re strategy, future actions (.9)	1.20 400.00/hr	480.00
12/4/2014	JB Prepare to defend depositions of opt-ins by reviewing Defendants prior depositions of party plaintiffs, preparing outline of likely questions, reviewing defendants document production to gather potential exhibits	4.20 250.00/hr	1,050.00
12/5/2014	JB Continue to prepare clients for depositions by reviewing and gathering relevant documents	2.60 250.00/hr	650.00
	JB Phone call with F. Cham regarding deposition preparation	0.50 250.00/hr	125.00
	JB Prepare correspondence to opposing counsel regarding sufficiency of cumulative time records and timeframe of time/pay records	0.40 250.00/hr	100.00
	JB Phone call with B. Artimus regarding deposition	0.60 250.00/hr	150.00
12/7/2014	JB Phone call with L. Hayes to prepare for deposition	0.60 250.00/hr	150.00
	JB Phone call with DRK regarding opt-in deposition preparation	0.30 250.00/hr	75.00
12/8/2014	JB Travel to deposition of clients in Douglasville (0.7); prepare clients, attend and defend depositions of Fannie Cham and Jamie Stephenson (6); travel from deposition of clients in Douglasville (0.5)	7.20 250.00/hr	1,800.00
12/9/2014	JB Travel to deposition of clients in Douglasville (0.6); prepare clients, attend and defend depositions of Bernard Artumus, Stephen Ventre, and Lamar Hayes (7.3); travel from deposition of clients in Douglasville (0.6)	8.50 250.00/hr	2,125.00
12/10/2014	JB Prepare correspondence regarding meditation and sufficiency of cumulative time cards (.2); prepare third requests for production of documents (.4); prepare discovery deficiency letter (.2); update phone calls with clients (.3)	1.10 250.00/hr	275.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
12/11/2014	JB Continue drafting discovery deficiency letter including reviewing document production to assess what remained outstanding	1.00 250.00/hr	250.00
12/13/2014	JB Review multiple correspondence from opposing counsel regarding mediation and respond to the same	0.20 250.00/hr	50.00
12/15/2014	JB Correspond with Lee Parks regarding scheduling mediation	0.10 250.00/hr	25.00
	JB Continue to strategize on how to most accurately calculate damages of the class given the new documents produced by defendant	0.80 250.00/hr	200.00
12/16/2014	JB Prepare correspondence to opposing counsel regarding defendants document production (0.2); prepare form mediation letter to invited clients (0.3); prepare form mediation to non-invited clients and settlement authorization (0.3); continue to work on damages calculations (0.3)	1.10 250.00/hr	275.00
	TO Worked on overtime calculations for Artumus.	2.70 115.00/hr	310.50
12/17/2014	SC Per JB's request I prepared and sent out a mediation update letter packets to all 50 clients that turned in signed consent forms for this case. I also created a chart for nine attendees and 41 non attendees to keep track of RSVP's and returned authorizations.	6.00 85.00/hr	510.00
	JB Revise mediation notice letters, determine invitees, and prepare for distribution of the notice letters	0.90 250.00/hr	225.00
	JB Review damages calculations documents	0.30 250.00/hr	75.00
	JB Prepare correspondence for late filed consents	0.20 250.00/hr	50.00
	JB Begin to prepare motion for opt-ins to relate back or equitable tolling	1.10 250.00/hr	275.00
	JB Review Defendants supplemental document production	1.30 250.00/hr	325.00
	JB Phone call with C. Simmons regarding mediation	0.30 250.00/hr	75.00
	TO Worked on overtime calculations for Artumus, Cham.	1.20 115.00/hr	138.00
	TO Prepared overtime calculations for Cham.	1.60 115.00/hr	184.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
12/17/2014	TO	Prepared overtime calculations for Ventre.	1.60 115.00/hr	184.00
	TO	Prepared overtime calculations for Booze.	1.90 115.00/hr	218.50
12/18/2014	TO	Prepared overtime calculations for Graham.	2.10 115.00/hr	241.50
	TO	Prepared overtime calculations for Graham.	0.50 115.00/hr	57.50
	TO	Prepared overtime calculations for Holmes.	0.90 115.00/hr	103.50
	TO	Prepared overtime calculations for Stevenson, Davis (began).	2.70 115.00/hr	310.50
12/19/2014	TO	Worked on overtime calculations for Davis.	0.40 115.00/hr	46.00
12/22/2014	TO	Prepared Creekmore overtime calculations.	0.50 115.00/hr	57.50
	TO	Prepared Burgess overtime calculations.	1.30 115.00/hr	149.50
	TO	Prepared Bolton overtime calculations.	0.30 115.00/hr	34.50
	TO	Prepared Brinkley overtime calculations.	0.20 115.00/hr	23.00
	TO	Prepared Caudle overtime calculations.	0.40 115.00/hr	46.00
	TO	Prepared Chisholm overtime calculations.	0.20 115.00/hr	23.00
	TO	Prepared Craft overtime calculations.	1.40 115.00/hr	161.00
12/23/2014	TO	Prepared Davis, Willoughby calculations.	4.10 115.00/hr	471.50
12/29/2014	TO	Prepared Floyd overtime calculations.	0.80 115.00/hr	92.00
	TO	Prepared Dean overtime calculations.	1.50 115.00/hr	172.50



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		<u>Hrs/Rate</u>	<u>Amount</u>
12/30/2014	JB	1.70 250.00/hr	425.00
	DRK	3.60 400.00/hr	1,440.00
1/4/2015	JB	0.20 250.00/hr	50.00
	JB	0.10 250.00/hr	25.00
	JB	0.70 250.00/hr	175.00
1/5/2015	TO	1.50 115.00/hr	172.50
	TO	4.70 115.00/hr	540.50
	JB	0.70 250.00/hr	175.00
1/6/2015	SC	2.50 85.00/hr	212.50
	TO	7.70 115.00/hr	885.50
	JB	4.10 250.00/hr	1,025.00
	JB	1.50 250.00/hr	375.00
	JB	0.30 250.00/hr	75.00

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		<u>Hrs/Rate</u>	<u>Amount</u>	
1/6/2015	DS	Researched and reserved hotel and meeting rooms in Douglasville, GA for depositions.	0.80 85.00/hr	68.00
	DRK	emails to/from client (.8); emails to/from o/c; conf. with JB re strategy (.5), future actions; review of file re motion to compel matters and missing discovery (1.5)	2.80 400.00/hr	1,120.00
1/7/2015	TO	Demand calculations for Sykes, Williams, Bridgers, Cooper, Drake, Flood, Gaddy, Gilstrap, Manning, Reid, Schwam, Starr, Stevens, Waugh, complied information.	9.30 115.00/hr	1,069.50
	JB	Phone call with B. Artumus regarding discovery responses meeting	0.20 250.00/hr	50.00
	JB	Legal research on standards for decertification post-discovery (1.5) ; phone call with potential damages expert (0.8); gather documents for experts review (0.4); begin to prepare to defend opt-in depositions (0.3); communicate with multiple clients regarding preparing discovery responses (0.6)	3.60 250.00/hr	900.00
	JB	Multiple emails with A. Cooper regarding production of responsive documents and review documents produced by client	0.30 250.00/hr	75.00
1/8/2015	SC	Per JB's request I called Sherri Grant, Matthew Haecker, Frederick Hoxie, Steven Liner and Nicole Stevens to schedule depositions for 3 open slots that needed to be filled.	0.20 85.00/hr	17.00
	SC	Per JB's request I called Markus Brown, Phillip Davis, Paul Willoughby, Sherri Grant, and Jamie Stephenson to inform them that the mediation had been cancelled. I also sent a letter to each of them re same.	0.30 85.00/hr	25.50
	TO	Complied info, summary, edits.	1.70 115.00/hr	195.50
	TO	Reviewed discovery requests for uniformity, noted discrepancies.	1.70 115.00/hr	195.50
	JB	Continue to prepare responses to individual discovery requests	1.60 250.00/hr	400.00
	JB	Review and analyze opposing counsels offer of judgment	0.30 250.00/hr	75.00
	DS	Researched and printed emails (.2)	0.20 85.00/hr	17.00
	DS	Print client documents for JB (.3)	0.30 85.00/hr	25.50

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		<u>Hrs/Rate</u>	<u>Amount</u>
1/9/2015	JB	Continue to prepare responses to individual opt-in discovery requests (2.0); begin to prepare to defend depositions of opt-ins, prepare declaration in opposition to motion for decertification (1.3)	3.30 250.00/hr 825.00
	DS	Prepare and print and copy documents for upcoming depositions (1.5)	1.50 85.00/hr 127.50
1/11/2015	JB	Review and analyze damages calculations sheets for each opt-in	4.00 250.00/hr 1,000.00
1/12/2015	SC	I called Ronald McNair and Telleah Davis to see if they could meet with Julie and Doug to discuss the case	0.10 85.00/hr 8.50
	TO	Compiled documents for total hours under 80.	4.20 115.00/hr 483.00
	JB	Travel to Douglasville for client meetings and depositions (0.8); prepare two clients for depositions, review client time and payroll records to prepare for multiple client discovery response meetings, meet with six clients to complete discovery responses (8); review defendants offer of judgment and Rule 11 motion (1); review and analyze notes from client meetings to assess deficiencies and document production and future litigation steps and begin to review time and payroll records for Tuesday morning client meetings (1.4)	11.20 250.00/hr 2,800.00
	DRK	travel to Douglasville, meeting with multiple clients re preparation for deposition; review of key documents and payroll items with clients; defending of depositions	9.10 400.00/hr 3,640.00
1/13/2015	TO	Research on joint employee termination / ADA action.	1.30 115.00/hr 149.50
	JB	Review file material to assess developments in the case and litigation strategy (.5); client meeting with T. Floyd to prepare for deposition and confer with opposing counsel regarding deposition (1.0); client meeting with S. Liner regarding discovery responses and deposition preparation and defendant clients deposition (1.0); prepare for phone call with damages expert and call with expert (.5); client meeting with B. Creekmore regarding discovery responses (1.0); prepare for and meeting with three clients regarding preparation of discovery responses (1.8)	5.60 250.00/hr 1,400.00
	JB	Multiple client meetings with J. Lockette, T. Armstead, and L. Hayes regarding offer of judgment and discovery responses	3.50 250.00/hr 875.00
	DS	Drafted and finalized letter to J. Mulroy (.2)	0.20 85.00/hr 17.00
	DRK	meeting with clients re defending depositions (.8); o/c with JB re same (.3); participation in deposition (6.6)	7.70 400.00/hr 3,080.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
1/14/2015	TO Matched date ranges and bates numbers.	3.30 115.00/hr	379.50
	TO Draft first ROGS RPD to claimant.	0.80 115.00/hr	92.00
	JB Prepare for defense of T. Floyds deposition and attend the same (2); travel from T. Floyds deposition (0.6)	2.60 250.00/hr	650.00
	JB Revise response to Rule 11 letter; phone call with B. Graham regarding litigation; phone call with B. Artumus regarding litigation and discovery responses; prepare multiple correspondence to clients regarding discovery responses; review documents produced by clients from client meetings	3.00 250.00/hr	750.00
	DS Prepared chart of clients' Consents and dated filed (1)	1.00 85.00/hr	85.00
	DS Download, saved and printed Defendants document production (.3)	0.30 85.00/hr	25.50
1/15/2015	TO Legal research on joint employee ADA claims.	2.00 115.00/hr	230.00
	JB Various correspondence with A. Cooper regarding preparation of discovery responses	0.20 250.00/hr	50.00
	JB Receipt and review of opposing counsels Rule 11 reply correspondence	0.10 250.00/hr	25.00
	JB Phone call with B. Artumus regarding discovery responses (0.5); revise and edit damages calculation sheets for supplemental production and produce the same (5.8)	6.30 250.00/hr	1,575.00
	DS Scanned and saved discovery responses.	0.30 85.00/hr	25.50
	DRK Meeting with clients/witnesses in Douglasville (3.8); emails and call with o/c (.5); return travel to Atlanta (1.0); reiview of Rule 11 notice and research re same and lengthy preparation of draft response (3.5)	8.80 400.00/hr	3,520.00
1/16/2015	TO Overtime calculations.	3.10 115.00/hr	356.50
	JB Continue to prepare motion to compel (2); phone calls with multiple clients regarding discovery responses and begin preparing the same (3.5)	5.50 250.00/hr	1,375.00
	DRK preparation of supplemental discovery responses (2.8); phone discusssions with 2 clients (.8); email correspondence with o/c (.8)	4.40 400.00/hr	1,760.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
1/18/2015	JB Continue to prepare motion to compel	3.70 250.00/hr	925.00
1/19/2015	TO Joint employee ADA research and findings.	0.50 115.00/hr	57.50
	TO Bankruptcy research.	3.10 115.00/hr	356.50
	JB Continue to prepare motion to compel	1.80 250.00/hr	450.00
	JB Phone calls with clients regarding discovery responses	0.70 250.00/hr	175.00
	DRK Emails to/from o/c re various motion to compel issues (.5); preparation of deposition. notice and forward to J. Mulroy (.3)	0.80 400.00/hr	320.00
1/20/2015	TO Contact individuals to gather info for discovery responses.	1.40 115.00/hr	161.00
	JB Review documents produced by client, L. Hayes	0.80 250.00/hr	200.00
	JB Continue to prepare responses to individual discovery requests served on the opt-in Plaintiffs	0.80 250.00/hr	200.00
	JB Phone call with opposing counsel regarding discovery and settlement (.3); prepare clarification of 30(b)(6) topic number 9 (1.1); correspond with the Court regarding discovery conference call (.2)	1.60 250.00/hr	400.00
	JB Phone call with opposing counsel regarding discovery and settlement; prepare clarification of 30(b)(6) topic number 9 (.8); correspond with the Court regarding discovery conference call (.8)	1.60 250.00/hr	400.00
	DS Burn discovery production to disc for overnight delivery to M. Thompson (.5)	0.50 85.00/hr	42.50
	DS Draft, finalize and email 30(b)(6) of Latonya Pendelton to opposing counsel	0.40 85.00/hr	34.00
	DRK Conf. call with o/c and others (.7); call with Matthew Thompson and discussion of expert report issues (1.1)	1.80 400.00/hr	720.00
1/21/2015	JB Prepare synopsis of discovery dispute	1.10 250.00/hr	275.00
	DS Forward discovery produced by Youth Villages to M. Thompson via CRA secure file system. (1.5)	1.50 85.00/hr	127.50

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			<u>Hrs/Rate</u>	<u>Amount</u>
1/22/2015	TO	Contacted individuals for discovery.	1.90 115.00/hr	218.50
	TO	Searched WestLaw, various other databases for opinion letters; could not find.	2.10 115.00/hr	241.50
	JB	Phone call with Mathew Thompson regarding produced text files (0.2); revise discovery synopsis (0.4); prepare correspondence to opposing counsel regarding text data production (0.2)	0.80 250.00/hr	200.00
	JB	Final revisions to discovery synopsis; phone call with J. Gilstrap regarding discovery responses	1.20 250.00/hr	300.00
	DRK	Preparation of discovery dispute synopsis for Court; calls from clients re status, future actions.	2.40 400.00/hr	960.00
1/23/2015	SC	I mailed verifications to Brian Bridges, Britt Caudle, Meranda Bice, and John Gilstrap.	0.10 85.00/hr	8.50
	TO	Verifications.	0.40 115.00/hr	46.00
	JB	Confer with defendant regarding Monday deposition	0.20 250.00/hr	50.00
	JB	Phone call with D. Hazelwood regarding settlement and discovery responses (0.5); review correspondence from opposing counsel regarding withdraw affirmative defenses prepare summary of current affirmative defense for use at 30(b)(6) deposition (0.3); preparation for 30(b)(6) deposition (0.4)	1.20 250.00/hr	300.00
	JB	Review defendants expert damages report	0.50 250.00/hr	125.00
	DS	Forward all discovery received from Youth Villages to M. Thompson at CRA	1.00 85.00/hr	85.00
1/25/2015	JB	Review case law on requirements for lawful use of FWW	0.30 250.00/hr	75.00
	DRK	Preparation for deposition of Latoya Pendleton, including review of key documents and prior testimony.	2.60 400.00/hr	1,040.00
	DRK	research re case previous in front of this Judge and preparation of memo to file re same;	1.20 400.00/hr	480.00
1/26/2015	JB	Revise and edit response to Defendants discovery dispute outline	0.40 250.00/hr	100.00
	DS	Forward recent discovery production from Youth Villages to CRA via secure email. (.4)	0.40 85.00/hr	34.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
1/26/2015	SC	I emailed verification to Mr. Haecker, and mailed verifications to Mr. Starr and Ms. Waugh	0.10 85.00/hr	8.50
	TO	Contacted individuals for opt-ins / discovery info	4.60 115.00/hr	529.00
	DRK	taking of L. Pendleton deposition.	3.70 400.00/hr	1,480.00
1/27/2015	DS	Forward recent discovery production from Youth Villages to CRA via secure email. (.4)	0.40 85.00/hr	34.00
	DS	Save Travis Floyd deposition transcript and exhibits	0.30 85.00/hr	25.50
	DS	Save discovery documents received from Youth Villages	0.30 85.00/hr	25.50
	SC	I mailed verifications to Ms. Davis and Mr. Burgess	0.10 85.00/hr	8.50
	DRK	Conference with TO and JB re discovery issues, preparation for discovery call (2.0); engaging in discovery call with Judge Jones re status, future actions (.4)	2.40 400.00/hr	960.00
1/28/2015	JB	Prepare for discovery dispute conference call with Judge Jones (.3); legal research on requirement to supplement initial disclosures and Defendants supplementation of potential witnesses (3.5)	3.80 250.00/hr	950.00
	DS	Create shell of consolidated Request for production of documents and ROG responses 2.3	2.30 85.00/hr	195.50
	TO	Contacted individuals for opt-ins/ discovery info; compiled remaining individuals and information	4.10 115.00/hr	471.50
1/29/2015	SC	I mailed verifications to Ms Harris and Mr. Booze	0.10 85.00/hr	8.50
	TO	Contacted individuals for opt-ins/ discovery info; compiled remaining individuals and information	5.30 115.00/hr	609.50
1/30/2015	JB	Revise and edit responses to discovery requests (2.5); phone call with P. Manning regarding discovery response (.2); phone call with T. Sawadogo regarding discovery responses (.4); begin to prepare responses and objections to Defendants request for production of documents (2.5)	5.60 250.00/hr	1,400.00
	SC	I mailed a verification to Portia Manning	0.10 85.00/hr	8.50

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		<u>Hrs/Rate</u>	<u>Amount</u>
1/30/2015	TO Input information into consolidated discovery docs	1.90 115.00/hr	218.50
1/31/2015	JB Continue to prepare responses and objections to Defendants requests for production of documents and interrogatories on the opt-in plaintiffs (8.0); phone call with A. Davis regarding discovery responses (.6); phone call with A. Chisholm regarding discovery responses (.7)	9.30 250.00/hr	2,325.00
	DRK review and edit of discovery responses for production and transmittal to o/c re same.	2.50 400.00/hr	1,000.00
2/2/2015	SC Per JB and Douglas R. Kertscher request I called Mr. Hoxie, Ms. Jordan, Mr. Harris, Ms. Brinkley, Ms. Drake, Ms. Gaddy, Ms. Simmons. Ms. Smith, and Nicole Stevens	0.30 85.00/hr	25.50
	JB Phone call with S. Drake regarding discovery responses (0.3); prepare class wide correspondence regarding outstanding discovery (0.5); phone call with B. Harris regarding discovery responses (0.3).	1.10 250.00/hr	275.00
	JB Review Defendants document regarding the timing of the recently added witnesses (0.5); phone call with C. Gaddy regarding discovery responses (0.4); phone call with F. Hoxie (0.5); phone call with N. Stevens regarding discovery response (0.4).	1.80 250.00/hr	450.00
	DRK work with expert on long call re report issues, using documents and various testimony, discussing report issues.	2.40 400.00/hr	960.00
2/3/2015	JB Prepare supplemental responses to ROGs, and RFAs.	2.80 250.00/hr	700.00
	JB Phone call with G. Smith regarding discovery responses.	0.50 250.00/hr	125.00
2/4/2015	SC I mailed a verification to Jamie Stephenson, Nicole Stevens, Jasmine Jordan	0.20 85.00/hr	17.00
	SC I sent out an EEOC questionnaire/charge form to client	0.10 85.00/hr	8.50
	SC Per JB's request I drafted and mailed letters to the 27 plaintiff's that we did not receive signed verifications from	2.50 85.00/hr	212.50
	JB Phone call with J. Jordan regarding discovery responses (0.4); continue to review Defendants discovery deficiency letter and begin to prepare response (0.6); phone call with J. Stephenson regarding discovery responses (0.4); prepare and finalize supplemental responses to interrogatories and requests for admission and J. Stephensons responses to requests for production of documents and prepare J. Stephensons responsive documents for services (1.8); prepare correspondence responding to defendants allegations of	8.50 250.00/hr	2,125.00



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		<u>Hrs/Rate</u>	<u>Amount</u>
	discovery deficiency (3.4) review defendants document production for deficiencies (1.9).		
2/4/2015 DRK	Preparation of response to deficiency letter; multiple emails to/from o/c re various issues.	1.50 400.00/hr	600.00
2/5/2015 JB	Review Defendants citation to D. Thompson deposition testimony regarding decertification (0.2); prepare summary of defendants continued document deficiencies (0.5); continue to review defendants Jan. 31st document production (1.8); legal research on research FWW settlement consent order (0.3).	2.70 250.00/hr	675.00
JB	Meeting with D. Hazelwood.	0.50 250.00/hr	125.00
JB	Prepare summary of defendants document deficiencies (0.6); review defendants discovery requests and certificates of service to assess whether Sherry Grant was served (0.4); phone call with defendant regarding discovery disputes (0.9); prepare summary of discovery conference call with defendants (0.3).	2.20 250.00/hr	550.00
2/6/2015 SC	Per JB's request I sent out Dismissal Notifications to Ariel Chisholm, Ronald McNair, Chardai Simmons, and Sherilyn Brinkley. I also sent out 24 letters to plaintiff's that were served discovery.	4.00 85.00/hr	340.00
JB	Prepare correspondence to clients regarding dismissal (0.2); prepare correspondence to clients regarding document production and text message requests (0.3); prepare correspondence to opposing counsel regarding discovery conference call discussions including response and reply correspondence (0.6).	1.10 250.00/hr	275.00
2/9/2015 JB	Review Defendants supplemental document production (0.2); prepare correspondence to opposing counsel regarding deficiency of said production (0.1); prepare correspondence to damages expert regarding supplemental document productions (0.2).	0.50 250.00/hr	125.00
JB	Phone call with M. Thompson regarding damages report (0.3); review defendants document production (1.5); prepare chart outlining date consent filed and each Plaintiffs period of recovery (0.8).	3.60 250.00/hr	900.00
2/11/2015 JB	Fact investigation to supplement Plaintiffs discovery responses including phone calls to multiple clients and begin preparing supplemental responses.	3.00 250.00/hr	750.00
2/12/2015 JB	Review and analyze Defendants motion for decertification and related exhibits (.6); review and analyze Defendants motion to stay discovery (.4)	1.00 250.00/hr	250.00
JB	Continue to prepare table of start and end dates for each plaintiffs damages timeframe for expert (1.5); review and respond to correspondence from opposing counsel and the court regarding stay of	2.80 250.00/hr	700.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
	discovery (.4); continue to prepare supplemental discovery responses by reviewing plaintiffs deposition transcripts (.9)		
2/13/2015	JB Prepare correspondence to opposing counsel regarding Mr. Hoxies outstanding records (0.1); phone call with expert regarding report status (0.5); review defendants document production to remedy experts concerns (0.6); continue to prepare response to motion for decertification 2.	3.20 250.00/hr	800.00
2/16/2015	SC I prepared a letter and mailed client correspondence received from oc	0.10 85.00/hr	8.50
	SC I sent a mass email and called Cherese Gaddy, Frederick Hoxie, John Gilstrap, Jasmine Jordan, Markus Brown, Nicole Stevens, Portia Manning, Starsheema Drake, Leah Sykes, Fannie Cham, Bethany jackson and Byron Graham re sending in signed verifications	0.30 85.00/hr	25.50
	JB Review file material regarding signed verifications and work to obtain outstanding verifications.	0.20 250.00/hr	50.00
	JB Phone call with S. McDowell regarding lawsuit participation	0.10 250.00/hr	25.00
	JB Phone call with M. Thompson regarding expert report (0.3); review Plaintiffs and Defendants expert reports (2.5).	2.80 250.00/hr	700.00
	JB Phone call with C. Gaddy regarding verification.	0.10 250.00/hr	25.00
2/17/2015	JB Prepare multiple correspondence to opposing counsel regarding discovery; review M. Thompsons Exhibit B to assess individual damages claims; review and analyze Defendants settlement offers.	2.00 250.00/hr	500.00
	JB Review and respond to correspondence with opposing counsel regarding email production (0.3); phone calls to clients regarding settlement (0.3); prepare multiple correspondence to opposing counsel regarding deposition schedule and revise deposition notices (0.4); review Defendants supplemental document production relating to expert backup materials (1.1).	2.10 250.00/hr	525.00
	JB Multiple phone calls with prospective plaintiff.	0.40 250.00/hr	100.00
2/18/2015	JB Confer with opposing counsel regarding email production (0.3); continue to prepare supplemental discovery responses including reviewing relevant deposition transcripts (2.4).	2.70 250.00/hr	675.00
2/20/2015	JB Legal research on the standard for decertification in order to prepare response brief.	3.20 250.00/hr	800.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
2/20/2015	JB	Revise motion for extension and prepare for filing.	0.30 250.00/hr	75.00
2/21/2015	DRK	work on response brief in opposition to certification (5.3); review of Defendant's key cases and arguments (1.8); preparation of additional research for same (1.2)	8.30 400.00/hr	3,320.00
2/22/2015	DRK	continued work on de-certification brief.	7.90 400.00/hr	3,160.00
2/23/2015	JB	Review and analyze case law cited by opposing counsel regarding damages calculation.	0.50 250.00/hr	125.00
	DRK	Preparation for Dorsey deposition, including review of related documents. and testimony.	3.80 400.00/hr	1,520.00
2/24/2015	JB	Continue to prepare response to motion for decertification including reviewing deposition of L. Pendelton and incorporating the same into the statement of facts.	1.40 250.00/hr	350.00
	DRK	emails to/from o/c re various discovery issues (.4); call from clients re status, futue actions (1.1)	1.50 400.00/hr	600.00
	DRK	continued work on De-cert brief.	5.20 400.00/hr	2,080.00
2/25/2015	JB	continuing preparing response to motion for decertification including drafting, legal research on employers obligations related to automatically deducted breaks and reviewing multiple deposition transcripts (7).	7.70 250.00/hr	1,925.00
	DRK	travel to Douglasville (1.0); taking of Dorsey deposition (2.5); return travel to office (1.0); long calls from clients re future actions, status (1.4)	5.90 400.00/hr	2,360.00
2/26/2015	JB	Continue preparing response to motion to compel.	2.10 250.00/hr	525.00
	JB	Prepare consent discovery extension.	0.20 250.00/hr	50.00
	JB	Phone call with B. Graham regarding status of litigation (0.2); review document requests for requests relating to witness statements (0.2).	0.40 250.00/hr	100.00
3/3/2015	JB	Begin to prepare motion for summary judgment by reviewing deposition testimony of D. Thompson for statement of undisputed facts (1.3) reviewing deposition testimony of E. Dorsey for statement of undisputed facts (0.8); begin reviewing deposition testimony of E. Dowdel for statement of undisputed facts (0.8).	2.90 250.00/hr	725.00
3/4/2015	JB	Continue to prepare motion for summary judgment by continuing to review deposition testimony of E. Dowdel for statement of undisputed facts (1); reviewing deposition testimony of T. Floyd for statement of	3.70 250.00/hr	925.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
	undisputed facts (1); reviewing deposition testimony of P. Willoughby for statement of undisputed facts (1.7).		
3/4/2015	JB Prepare for B. Dickson deposition including preparing an outline of questions and reviewing relevant time and payroll records.	3.60 250.00/hr	900.00
	JB Review and analyze Defendants second offer of judgment.	0.30 250.00/hr	75.00
3/5/2015	JB Continue to prepare motion for summary judgment by review deposition testimony of 30(b)(6) witness for statement of undisputed facts (1.9); review deposition testimony of Byron Graham witness for statement of undisputed facts (0.5); prepare second offer of judgment offer letters (0.4); continue to prepare for Dickson deposition by preparing outline, reviewing pay and time records for exhibits, and phone call with M. Thompson (4.3).	7.10 250.00/hr	1,775.00
	JB Prepare declaration of M. Williams for response to decertification motion.	0.30 250.00/hr	75.00
	SC I drafted and sent letters to all clients (47) in regards to each individuals settlement offer given by youth villages.	0.70 85.00/hr	59.50
3/6/2015	JB Travel to videoconferencing center for deposition of B. Dickson (0.5); continue to prepare for deposition of B. Dickson (0.7); take deposition of B. Dickson (3).	4.20 250.00/hr	1,050.00
3/9/2015	JB Revised and edit response to motion to decertify the class.	3.30 250.00/hr	825.00
	JB Prepare correspondence to opposing counsel regarding supplementation of RPD No. 9 with My Schedule reports.	0.10 250.00/hr	25.00
3/10/2015	JB Continue to review deposition of B. Graham for statement of facts in summary judgment motion (1.5); review deposition transcript of P. Davis for statement of facts (0.8).	2.30 250.00/hr	575.00
3/11/2015	JB Review deposition transcript of J. Stephenson for statement of facts (1.1); review deposition transcript of S. Reid for statement of facts (0.7); review deposition transcript of S. Ventre for statement of facts (0.7); review deposition transcript of F. Cham for statement of facts (0.8) review deposition transcript of R. Schwam for statement of material facts (1.3); review deposition transcript of L. Hayes for statement of material facts (0.9); begin to review deposition of L. Flood for statement of material facts (0.5).	6.00 250.00/hr	1,500.00
	JB Phone calls with several clients regarding Defendants second offer of judgment.	0.20 250.00/hr	50.00
	JB Review summary of Defendants email production.	0.40 250.00/hr	100.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
3/12/2015	JB	2.30 250.00/hr	575.00
	Finish review of L. Flood deposition for statement of material facts (0.4); begin to draft statement of material facts (1); various phone calls with clients regarding offer of judgment including Brandon Harris, Telleah Davis, and Travis Floyd (0.4); continue drafting motion for summary judgment (0.5).		
3/13/2015	JB	6.50 250.00/hr	1,625.00
	Continue drafting motion for summary judgment (2.5); legal research on requirement to contemporaneously pay overtime (1.0); legal research on requirement for hours to fluctuate (1.0); legal research on recent FWW opinions (.8); legal research for research DOL opinions (1.2)		
	JB	0.40 250.00/hr	100.00
	Phone call with B. Caudel regarding offer of judgment (0.2); prepare notice of acceptance of offer of judgment (0.2).		
3/14/2015	DRK	8.40 400.00/hr	3,360.00
	work on draft motion for summary judgement		
3/15/2015	DRK	6.20 400.00/hr	2,480.00
	continued work on s.j. issues.		
3/16/2015	JB	8.20 250.00/hr	2,050.00
	Continue to draft motion for summary judgment.		
3/17/2015	JB	0.20 250.00/hr	50.00
	Finalize notice of acceptance of offer of judgment for T. Davis.		
3/19/2015	SC	0.10 85.00/hr	8.50
	Mailed verification to Brian Bridges		
3/21/2015	JB	3.60 250.00/hr	900.00
	Review and analyze Defendants reply in support of motion for decertification (0.5); revise and edit motion for summary judgment (3.1).		
3/23/2015	JB	5.10 250.00/hr	1,275.00
	Revise and edit brief in support of motion for summary judgment and gather exhibits (1.0); prepare motion (1.0); prepare statement of undisputed material facts (3.1)		
	JB	0.10 250.00/hr	25.00
	Revise T. Davis notice of acceptance of offer of judgment.		
	JB	1.10 250.00/hr	275.00
	Begin to prepare motion to strike Defendants reply in support of their motion for decertification, including legal research on appropriate standard.		
3/24/2015	JB	1.30 250.00/hr	325.00
	Continue drafting motion to strike.		
	JB	0.10 250.00/hr	25.00
	Prepare correspondence to opposing counsel regarding acceptance of offer of judgment.		

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			<u>Hrs/Rate</u>	<u>Amount</u>
3/24/2015	DRK	edit of motion to strike reply brief in support of decert. because new information presented.	6.30 400.00/hr	2,520.00
3/25/2015	JB	Send multiple emails to opposing counsel regarding timeliness of T. Davis notice of acceptance (0.2); review Defendants filing of certificate (0.1).	0.30 250.00/hr	75.00
	JB	Revise and edit motion to strike.	1.20 250.00/hr	300.00
	JB	Prepare supplement to plaintiffs response to the motion to decertify.	0.50 250.00/hr	125.00
	DRK	review and edit of discovery responses (1.2); meeting with JB re same (.3); call to client re same and followup information needed (.5)	2.00 400.00/hr	800.00
3/27/2015	JB	Prepare correspondence to opposing counsel regarding T. Floyd settlement.	0.10 250.00/hr	25.00
3/30/2015	JB	Review and analyze Defendants motion for summary judgment, including analyze case law cited by Defendant.	2.30 250.00/hr	575.00
	JB	Prepare correspondence to opposing counsel containing counteroffer on T. Floyd settlement.	0.10 250.00/hr	25.00
3/31/2015	JB	Continue to read and analyze case law cited in Defendants Motion for Summary Judgment.	1.70 250.00/hr	425.00
	SC	I drafted and mailed letters re settlement agreements to Flood, Gaddy, Cooper, Jackson, and Sykes.	0.30 85.00/hr	25.50
4/1/2015	JB	Phone call to M. Brown regarding verification (0.1); phone call to T. Floyd regarding settlement (0.1).	0.20 250.00/hr	50.00
4/2/2015	JB	Begin to prepare response to Defendants statement of material facts.	3.30 250.00/hr	825.00
4/3/2015	JB	Review and analyze Plaintiffs exemption reports to respond to Binson declaration (1.2); continue to prepare response to Defendants statement of facts (2.4).	3.60 250.00/hr	900.00
4/6/2015	JB	Continue to draft response to defendants Motion for Summary Judgment.	1.30 250.00/hr	325.00
	JB	Continue to prepare response to defendants statement of material facts.	3.10 250.00/hr	775.00
4/7/2015	JB	Continue to prepare response to defendants statement of facts.	4.00 250.00/hr	1,000.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
4/7/2015	DRK work on draft response for motion for s.j., SMF response.	8.20 400.00/hr	3,280.00
4/8/2015	JB Continue drafting response brief to Defendants MSJ (2.4); begin preparing Plaintiffs statement of additional facts (0.5).	2.90 250.00/hr	725.00
4/9/2015	SC I called Angela Cooper, Bethany Jackson, Cherese Gaddy, Leah Sykes to follow up and see if they received settlement documents we sent.	0.10 85.00/hr	8.50
	SC Per JB's request I found and printed the exception reports for those plaintiffs that were not on the defendant's chart in regards to break deductions being canceled.	1.00 85.00/hr	85.00
4/10/2015	JB Separate phone calls from B. Bridges and J. Jordan regarding status of case	0.20 250.00/hr	50.00
4/14/2015	DRK continued work on s.j. response and declarations/testimony for same	8.50 400.00/hr	3,400.00
4/15/2015	SC I created an index of those who filed their consents late	0.20 85.00/hr	17.00
	JB Revise and edit response to Defendants motion for summary judgment.	5.00 250.00/hr	1,250.00
	JB Continue to revise and edit response to Defendants motion for summary judgment.	2.10 250.00/hr	525.00
	DRK Final work on s.j. response brief; edit and review of response to SMF.	6.50 400.00/hr	2,600.00
4/16/2015	JB Continue to revise and edit response to Defendants motion for summary judgment and prepare for filing by assuring consistency of exhibit citations.	3.20 250.00/hr	800.00
	SC Called clients that agreed to settle with Youth Villages to ensure that they return all settlement documents to our office	0.20 85.00/hr	17.00
	DS Finalize and file Motion for Summary Judgment with exhibits	2.30 85.00/hr	195.50
4/20/2015	JB Review and analyze Defendants response to Plaintiffs MSJ including reviewing cited authority and caselaw.	1.70 250.00/hr	425.00
	JB Prepare list of individuals interested in a second lawsuit.	0.30 250.00/hr	75.00
	DS File Maintenance (1)	1.00 85.00/hr	85.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
4/21/2015	JB For second lawsuit participants, review dates of employment.	0.20 250.00/hr	50.00
4/22/2015	JB Review questionnaire and prepare cover letter for second lawsuit participants.	0.30 250.00/hr	75.00
	JB Continue to prepare reply brief in support of Plaintiffs motion for summary judgment.	2.30 250.00/hr	575.00
	SC I sent 7 potential clients for the second lawsuit a questionnaire and fee contract	0.20 85.00/hr	17.00
4/23/2015	JB Legal research on summary judgment burdens in general and summary judgment burdens in FLSA cases for the reply brief.	3.20 250.00/hr	800.00
	DRK work on reply brief in support of s.j.	5.80 400.00/hr	2,320.00
4/24/2015	JB Phone call with A. Hart regarding joining second lawsuit.	0.20 250.00/hr	50.00
	SC I sent Angela Hart a questionnaire and fee contract	0.10 85.00/hr	8.50
4/27/2015	JB Legal research on admissibility of unsworn expert reports at summary judgment (0.9); prepare expert declaration to cure defect (0.2); prepare correspondence to M. Thompson regarding the same (0.1).	1.20 250.00/hr	300.00
4/28/2015	JB Coordinate dispersal of settlement checks.	0.20 250.00/hr	50.00
	JB Continue to draft reply brief in support of motion for summary judgment.	6.50 250.00/hr	1,625.00
4/29/2015	JB Continue drafting reply brief.	3.00 250.00/hr	750.00
4/30/2015	JB Continue drafting reply brief.	5.50 250.00/hr	1,375.00
	DS Recreate Exhibit 24 of Motion for Summary Judgment (1)	1.00 85.00/hr	85.00
5/4/2015	JB Final revisions and edits to reply in support of motion for summary judgment.	3.20 250.00/hr	800.00
5/5/2015	JB Review and analyze Defendants reply in support of their MSJ including Dickson declaration.	0.60 250.00/hr	150.00
5/8/2015	SC sent fee contract and questionnaire to Jasmine Moton	0.10 85.00/hr	8.50



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		<u>Hrs/Rate</u>	<u>Amount</u>
5/8/2015	JB Legal research damages owed for failure to pay the full base in response to receipt of checks from YV.	0.70 250.00/hr	175.00
5/14/2015	SC sent a fee contract and questionnaire to A. Hart re second potential lawsuit	0.10 85.00/hr	8.50
	JB Legal research on a defendant tendering partial payment during the course of litigation 1.4.	1.40 250.00/hr	350.00
5/18/2015	JB Prepare correspondence to opposing counsel regarding ramifications of cashing tendered checks.	0.70 250.00/hr	175.00
5/19/2015	JB Phone call with B. Harris regarding status of the case.	0.10 250.00/hr	25.00
5/20/2015	JB Revise and edit check tender correspondence (0.1); analyze opposing counsels response to the same (0.2); prepare correspondence to opposing counsel regarding returning tendered checks (0.2)	0.50 250.00/hr	125.00
5/29/2015	JB Review file material regarding status of T. Davis settlement check (.2); prepare correspondence to opposing counsel regarding the same (.2)	0.40 250.00/hr	100.00
	JB Phone call with S. Reid regarding status of litigation.	0.10 250.00/hr	25.00
6/2/2015	SC called and emailed participants for the second lawsuit to get an update on returning there questionnaires and fee contracts	0.10 85.00/hr	8.50
	JB Follow-up on the status of part two of the litigation.	0.30 250.00/hr	75.00
6/9/2015	JB Phone calls with B. Artumus and B. Bridges regarding status of litigation.	0.10 250.00/hr	25.00
6/10/2015	JB Phone call with J. Stephenson regarding status of the case (.1); review Court order regarding surreply in opposition to motion to disqualify (.1)	0.20 250.00/hr	50.00
6/17/2015	JB Prepare complaint for second lawsuit.	3.50 250.00/hr	875.00
	JB Review and analyze prior decertification briefing in order to prepare surreply.	1.20 250.00/hr	300.00
6/18/2015	JB Begin to prepare surreply in opposition to Defendants motion to decertify including preparation of M. Thompson declaration, analysis of exemption reports cited in Binson declaration, and review of new authority cited in Defendants reply.	4.20 250.00/hr	1,050.00
6/19/2015	JB Continue drafting surreply in opposition to Defendants motion to decertify (4.1); phone call with M. Thompson regarding deduction cancelations and declaration (0.4).	4.50 250.00/hr	1,125.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
6/22/2015	JB Finalize revisions and edits to surreply in opposition to motion for decertification.	1.70 250.00/hr	425.00
6/23/2015	JB Revise and edit complaint.	0.50 250.00/hr	125.00
	JB Phone call with T. Armstead regarding status of the litigation.	0.10 250.00/hr	25.00
6/24/2015	SC sent letter to Angela Hart re representation	0.10 85.00/hr	8.50
	JB Continue to revise and edit complaint (0.7) prepare civil cover sheet (0.2).	0.90 250.00/hr	225.00
	JB Prepare amended initial disclosures.	0.80 250.00/hr	200.00
6/25/2015	JB Prepare correspondence to opposing counsel regarding waiver of service and accompanying form.	0.50 250.00/hr	125.00
6/26/2015	JB Review and analyze Order granting motion to decertify (0.5); legal research on appeal of decertification orders (0.9).	1.40 250.00/hr	350.00
	JB Review Northern District of Texas Order regarding post-trial FLSA motions.	0.40 250.00/hr	100.00
6/28/2015	JC Research case law re appealing decertification of FLSA collective action.	0.90 250.00/hr	225.00
6/29/2015	JC Review order of decertification (.5); research and analyze case law re appealing decertification orders (1.6); prepare memo re same; correspondence with DRK re same (2.0)	4.10 250.00/hr	1,025.00
	JB Review correspondence from opposing counsel regarding waiver of service.	0.10 250.00/hr	25.00
6/30/2015	JB Prepare motion requesting a 1292(b) order for immediate review.	1.50 250.00/hr	375.00
7/1/2015	JC Correspondence with DRK re motion for certification for interlocutory appeal.	0.10 250.00/hr	25.00
7/6/2015	JB Review and analyze Court Order for legal error.	1.50 250.00/hr	375.00
7/8/2015	JB Continue legal research on interlocutory appeal.	0.30 250.00/hr	75.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
7/9/2015	JB Prepare lawsuit on behalf of individual Plaintiffs (2.2); prepare update correspondence to opt-in plaintiffs regarding decertification (0.1); prepare waiver of service documents (0.2); finalize complaint for filing (0.2).	2.70 250.00/hr	675.00
7/10/2015	JB Revise correspondence to clients regarding update on decertification order and coordinate sending of the forty letters (0.3); prepare civil cover sheet for complaint (0.2).	0.50 250.00/hr	125.00
7/15/2015	JB Separate phone calls with B. Artumus, T. Floyd, J. Jordan, M. Brown, B. Bridges	0.40 250.00/hr	100.00
7/20/2015	SC filed waiver of service of summons with court	0.10 85.00/hr	8.50
7/22/2015	JB Review recent decision by Judge Batten regarding FWW application for potential upcoming summary judgment refiling.	0.40 250.00/hr	100.00
	JB Review and analyze Defendants motion to dismiss and related filings (0.6); begin legal research on Rule 20 joinder versus collective action (1.5).	2.10 250.00/hr	525.00
	TC Review of file material in order to draft response to MTD	2.70 200.00/hr	540.00
7/23/2015	JB Office meeting with TC regarding response to motion to dismiss (0.3); continue research for cases permitting rule 20 joinder post-decertification (3.6).	3.90 250.00/hr	975.00
	TC Research 11th Circuit case law regarding FLSA and FRCP 8 and post-lqbal pleading requirements	1.10 200.00/hr	220.00
7/24/2015	JB Continue legal research for cases allowing Rule 20 joinder after decertification.	4.20 250.00/hr	1,050.00
	TC Continue to research GA case law	3.20 200.00/hr	640.00
7/25/2015	DRK review of YV Motion to dismiss on Joinder grounds; research re response, other rulings by Judge; email to Telephone call and JB outlining draft response, sending research for same.	6.70 400.00/hr	2,680.00
7/27/2015	JB Review and analyze recent 11th Circuit district court opinions denying motions to dismiss in FLSA cases.	0.50 250.00/hr	125.00
	JB Continue legal research on 11th Circuit general application of Rule 20 joinder in FLSA cases and general Rule 20 standards.	4.40 250.00/hr	1,100.00
	JB Review and analyze motion to dismiss, supporting brief, and supporting declaration.	0.50 250.00/hr	125.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
7/27/2015	TC	Continue to research 11th circuit rule 8 pleading cases to support position of sufficiency of pleading (.5); research 11th circuit case law re: Rule 20 joinder permitted after denial of conditional certification or decertification of a collective action (.5)	1.00 200.00/hr 200.00
7/28/2015	JB	Phone call with P. Davis regarding status of litigation.	0.10 250.00/hr 25.00
	JB	Begin to draft response to motion to dismiss for lack of joinder.	2.30 250.00/hr 575.00
	TC	Continue to research 11th circuit rule 8 pleading cases to support position of sufficiency of pleading (2.0); research 11th circuit case law re: Rule 20 joinder permitted after denial of conditional certification or decertification of a collective action (4.5)	6.50 200.00/hr 1,300.00
7/29/2015	JB	Continue to prepare response to motion to dismiss on joinder grounds.	2.40 250.00/hr 600.00
	TC	Continue to research Rule 8 and 11 in FLSA 11th circuit (1.0); draft rule 8 arguments section in Plaintiffs Brief in Opposition to Defendants Motion to Dismiss (4.7)	5.70 200.00/hr 1,140.00
7/30/2015	JB	Continue to prepare response to motion to dismiss on joinder grounds and revise motion regarding lqbal challenges.	3.20 250.00/hr 800.00
	TC	Continue to draft Rule 8 arguments section in Plaintiffs Brief in Opposition to Defendants Motion to Dismiss	5.00 200.00/hr 1,000.00
7/31/2015	JB	Continue to draft joinder portion of the response to motion to dismiss (3.2); revise and edit response to motion to dismiss for failure to plead with particularity (2.7).	5.90 250.00/hr 1,475.00
	TC	Continue to research Rule 11 in FLSA 11th circuit (1.5); draft rule 11 arguments section in Plaintiffs Brief in Opposition to Defendants Motion to Dismiss (2.7)	4.20 200.00/hr 840.00
	TC	Research 11th Circuit cases to support argument that group allegations were properly plead when facts are common to all plaintiffs (2.6); editing of brief in order to reflect case law in support of sufficiency of pleading of group allegations (2.2)	4.80 200.00/hr 960.00
8/1/2015	DRK	Preparation of motion for pre-trial order since YV missed deadline to re-file s.j.	2.50 400.00/hr 1,000.00
8/3/2015	JB	Prepare certificate of interested persons.	0.20 250.00/hr 50.00
	JB	Prepare certificate of interested persons.	0.20 250.00/hr 50.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
8/3/2015	JB Continue to revise and edit response to motion to dismiss.	2.30 250.00/hr	575.00
	TC Research 11th Circuit and general federal circuit authority for sufficiency of group allegations under Rule 8 in FLSA claims and proper for all Plaintiffs to rely on such group allegations	6.00 200.00/hr	1,200.00
8/5/2015	JB Continue to revise and edit response to motion to dismiss.	2.20 250.00/hr	550.00
	TC Editing of Plaintiffs Response to Defendants Motion to Dismiss	0.70 200.00/hr	140.00
8/6/2015	TC Continue editing of Plaintiffs Response to Defendants Motion to Dismiss and cite check	1.70 200.00/hr	340.00
8/7/2015	JB Revise and edit response in opposition to motion to dismiss.	1.00 250.00/hr	250.00
	JB Review motion to dismiss and begin to prepare response brief.	0.20 250.00/hr	50.00
8/8/2015	TC Review/analyze Def. Motion to Dismiss in order to create a list/chart of the arguments (a) that were in Armstead but are not in McDougle, and (b) the arguments that were in McDougle but are not in Armstead in order to respond to MTD	1.00 200.00/hr	200.00
8/9/2015	JB Review and respond to correspondence from M. Bice regarding status of the litigation.	0.10 250.00/hr	25.00
8/10/2015	SC sent an update letter re case to Meranda Bice-McKelvy	0.10 85.00/hr	8.50
	JB Prepare response to motion to dismiss.	3.30 250.00/hr	825.00
	TC Continue to analyze Def. Motion to Dismiss in order to create a list/chart of the arguments (a) that were in Armstead but are not in McDougle, and (b) the arguments that were in McDougle but are not in Armstead in order to respond to MTD	1.00 200.00/hr	200.00
	DRK review of settlement/payroll spreadsheet and preparation of letter to Jim Mulroy re settlement demand.	1.00 400.00/hr	400.00
8/12/2015	JB Continue to revise and edit response to motion to dismiss; prepare for filing.	0.90 250.00/hr	225.00
8/15/2015	DRK further edit to response brief and conf. with JB and Travis re same.	3.50 400.00/hr	1,400.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
8/17/2015	JB	Review and analyze SDNY decision on assertion of good faith defense waiving attorney-client privilege to prepare discovery requests (0.3); review local rules on timing of Rule 26(f) conference and joint discovery report in the event that defendant files a motion to dismiss (0.3).	0.60 250.00/hr 150.00
8/19/2015	JB	Research whether a Rule 8 motion tolls the time for filing a responsive pleading and calculate responsive pleadings deadline.	0.20 250.00/hr 50.00
	JB	Research whether a Rule 8 motion tolls the time for filing a responsive pleading and calculate responsive pleadings deadline (0.2); review and analyze Defendants reply in support of motion to dismiss (0.3).	0.50 250.00/hr 125.00
8/20/2015	JB	Prepare a damage for the liquidated damages owed to the forty Armstead plaintiffs through April 5, 2014 assuming that 50% of the breaks were missed.	0.40 250.00/hr 100.00
8/24/2015	JB	Review and respond to correspondence from B. Graham regarding the status of the litigation.	0.10 250.00/hr 25.00
	JB	Review and analyze Defendants response to motion for trial calendar setting.	0.20 250.00/hr 50.00
	JB	Review and analyze Defendants reply in support of their motion to dismiss.	0.20 250.00/hr 50.00
8/25/2015	JB	Prepare calculation of figures for plaintiffs demand.	0.20 250.00/hr 50.00
	JB	Phone call with J. Stephenson regarding status of the litigation.	0.10 250.00/hr 25.00
	SC	made a chart of the liquidated damages owed to the plaintiffs through April 5, 2014	0.40 85.00/hr 34.00
	SC	sent copy of complaint to Mr. Graham	0.10 85.00/hr 8.50
8/31/2015	JB	Phone call w B. Creekmore regarding status of the case.	0.10 250.00/hr 25.00
	TC	Receipt/analyze Defendants renewed motion for summary judgment, statement of undisputed facts and affidavits in order to prepare response	1.70 200.00/hr 340.00
9/2/2015	SC	reviewed time and pay records for Phillip Davis and Jamie Stephenson	2.00 85.00/hr 170.00
	JB	Confer with TC regarding MSJ response responsibilities (0.1); review and analyze Defendants renewed motion for summary judgment and attached exhibits (1.4).	1.50 250.00/hr 375.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
9/3/2015	JB Continue to prepare response to motion for summary judgment.	0.70 250.00/hr	175.00
9/4/2015	DRK edit of response to dismiss, and research re additional cases to include in response (4.2); call from J. Stephenson re status, future actions (.8)	5.00 400.00/hr	2,000.00
9/9/2015	JB Prepare response to statement of facts.	5.60 250.00/hr	1,400.00
9/10/2015	SC I reviewed the break logs for Jamie Stephenson, Paul Willoughby and Phillip Davis	0.60 85.00/hr	51.00
	TC Receipt/analyze Defendants renewed motion for summary judgment (.5); Research 11th circuit case law re: record keeping by employer and outcome on Plaintiffs overtime claim ad specificity of allegations (2.0); Draft legal arguments for response to Defendants renewed motion for summary judgment (8.0)	10.50 200.00/hr	2,100.00
	JB Continue to prepare response to statement of facts.	6.60 250.00/hr	1,650.00
9/11/2015	TC Continue to draft legal arguments for response to Defendants renewed motion for summary judgment	3.00 200.00/hr	600.00
	JB Legal research on standard for granting motion to stay discovery (0.5); revise and edit response brief (0.4).	0.90 250.00/hr	225.00
	JB Legal research on standard for granting motion to stay discovery (0.5); revise and edit response brief (0.4).	0.90 250.00/hr	225.00
9/12/2015	JB Continue to prepare response to statement of facts and statement of additional facts.	2.50 250.00/hr	625.00
9/14/2015	JB Phone call with B. Artmus regarding status of litigation (0.1); phone call with B. Bridges regarding status of litigation (0.1).	0.20 250.00/hr	50.00
9/15/2015	JB Phone call with P. Dean regarding status of case and continued missed breaks.	0.10 250.00/hr	25.00
9/16/2015	JB Continue to prepare Plaintiffs statement of additional facts in opposition to summary judgment motion.	4.80 250.00/hr	1,200.00
	JB Phone call with S. Reid regarding status of the case.	0.10 250.00/hr	25.00
9/17/2015	JB Continue to prepare Plaintiffs statement of additional facts in opposition to summary judgment motion and response to defendants statement of facts along with revisions to memorandum of law in response to renewed Motion for Summary Judgment.	9.20 250.00/hr	2,300.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
9/17/2015	JB Phone call with B. Graham regarding status of the case, recent short staffing and missed breaks, and new supervisors failure to pay overtime.	0.20 250.00/hr	50.00
9/18/2015	JB Revise and edit memorandum of law in opposition to motion for summary judgment.	1.40 250.00/hr	350.00
9/19/2015	JB Revise and edit memorandum of law in opposition to motion for summary judgment.	2.30 250.00/hr	575.00
9/20/2015	JB Revise and edit memorandum of law in opposition to motion for summary judgment.	1.10 250.00/hr	275.00
9/21/2015	JB Revise and edit memorandum of law in opposition to motion for summary judgment, response to defendants statement of facts, and plaintiffs statement of additional facts (5.5); gather exhibits (1.0); prepare all for filing (.6)	7.10 250.00/hr	1,775.00
9/24/2015	JB Review defendants reply in support of motion to stay and prepare summary of misrepresentations.	0.70 250.00/hr	175.00
9/30/2015	JB Review file material for evidence that four plaintiffs did not elect not to join following the decertification order (0.2); review file material for TC transition (0.3).	0.50 250.00/hr	125.00
	JB Prepare summary chart on all plaintiffs.	3.30 250.00/hr	825.00
10/1/2015	JB Review Court Order (0.2); review file material to plan future action (0.3).	0.50 250.00/hr	125.00
	JB Review Court Order (0.5); review file material to plan future actions (0.8).	1.30 250.00/hr	325.00
10/2/2015	CM Correspondence with JB; Initial research into Youth Villages entity status	0.70 225.00/hr	157.50
	JB Continue to prepare summary chart on plaintiffs.	1.30 250.00/hr	325.00
10/6/2015	JB Review and analyze reply in support of motion for summary judgment including new exhibits and response to Plaintiffs statement of facts.	1.10 250.00/hr	275.00
10/7/2015	CM Research into Tennessee nonprofit status and corporate history in GA & NY	1.20 225.00/hr	270.00
10/8/2015	JB Begin to draft response to motion to clarify including legal research on status of claims/complaints post-severance.	1.30 250.00/hr	325.00
10/9/2015	JB Continue to prepare response to motion to clarify.	0.70 250.00/hr	175.00



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		<u>Hrs/Rate</u>	<u>Amount</u>
10/12/2015	JB Revise response to motion to clarify.	0.80 250.00/hr	200.00
10/14/2015	CM Review IRC 501(c)(3) requirements	0.80 225.00/hr	180.00
10/19/2015	JB Prepare objection to reply brief including reviewing deposition of E. Dowdell (1.4); legal research on declarations that contradict deposition testimony, admissibility of declarations of undisclosed witnesses, and standard for personal knowledge in a declaration (1.5)	2.90 250.00/hr	725.00
	JB Begin preparing form for individual complaints per Court order.	2.50 250.00/hr	625.00
10/20/2015	DRK edit of brief objecting to additional declarations as not admissible.	3.00 400.00/hr	1,200.00
10/21/2015	JB Revise objection to two declarations filed by Defendant with their MSJ reply.	0.90 250.00/hr	225.00
	JB Continue drafting form complaint to use for individual complaints per Court order.	1.10 250.00/hr	275.00
10/23/2015	JB Review notice of second errata and prepare a summary of the same.	0.20 250.00/hr	50.00
	TC Research Rule 8 pleading requirements in order to plead individualized facts that will survive a motion to dismiss	2.60 200.00/hr	520.00
	DRK edit and review of multiple new complaints for filing; office conf. with JB re same.	4.50 400.00/hr	1,800.00
10/26/2015	JB Revise form for individualized complaints (0.2); review and analyze Youth Villages document production to complete chart on severed Armstead Plaintiffs (3.5).	3.70 250.00/hr	925.00
10/27/2015	JB Continue to review documents produced by Youth Villages in order to prepare chart to use to assemble individual complaints.	2.80 250.00/hr	700.00
10/28/2015	JB Review client interview notes to prepare chart for individualized complaints.	2.80 250.00/hr	700.00
10/29/2015	JB Continue to review client interview notes to prepare chart for individualized complaints.	2.10 250.00/hr	525.00
10/30/2015	JB Continue to review client interview notes to prepare chart for individualized complaints and reviewing deposition testimony (4.6); prepare individual complaints (2.1).	6.70 250.00/hr	1,675.00
10/31/2015	JB Continue to draft individual complaints.	1.60 250.00/hr	400.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
11/2/2015	SC	Called Donesha Tramble, Kathy McDougale, Suzette McDowell, Sherri Grant, and David Thompson to ask additional questions re case	0.40 85.00/hr 34.00
	JB	Continue to prepare individualized complaints and prepare all complaints for filing.	5.80 250.00/hr 1,450.00
	JB	Review and analyze defendants response to objections to Dowdel and Turner declarations	0.30 250.00/hr 75.00
11/3/2015	JB	Prepare a reply in support of objection to declarations of Turner and Dowdel regarding Defendants renewed motion for summary judgment	1.00 250.00/hr 250.00
	JB	Revise and edit reply in support of objection to declarations of Turner and Dowdel regarding Defendants renewed motion for summary judgment	0.30 250.00/hr 75.00
11/9/2015	JB	Analyze file material and discovery requested in the Stephenson action in order to prepare a list of potential discovery to request in the severed cases in the event that Defendant does not file a MTD	1.50 250.00/hr 375.00
11/10/2015	CM	Final non-profit research re: youth villages and Tennessee statute	1.20 225.00/hr 270.00
11/12/2015	JB	Analyze defendants prior document production and prepare an index of the same	1.50 250.00/hr 375.00
11/13/2015	JB	Analyze defendants prior document production and prepare an index of the same	1.30 250.00/hr 325.00
11/19/2015	JB	Review and analyze EDTX opinion regarding use of 0.5 vs 1.5 overtime premiums	0.40 250.00/hr 100.00
11/23/2015	TC	Receipt/analyze Defendants Motion to Dismiss in order to compare to previously filed Motion to Dismiss and determine arguments in response to same (1.1)	1.10 200.00/hr 220.00
	DRK	receipt and review of new motions for YV, office conf. with Travis re same.	1.70 400.00/hr 680.00
11/25/2015	TC	Receipt/analyze 5 motions to dismiss and memorandums in support filed by Defendant in order to determine if whether same arguments are presented in comparison with previous motions to dismiss (1.8)	1.80 200.00/hr 360.00
	TC	Receipt/analyze remaining 36 Motions to Dismiss from Defendant in order to determine arguments presented (3.5); draft/create spreadsheet of applicable arguments in each MTD (1.5)	5.00 200.00/hr 1,000.00
11/28/2015	TC	Review all 43 cases in order to determine that Defendant only filed 11 motions (1.0); research statute of limitations and recovery period in reference to decertified FLSA collective actions (2.5)	3.50 200.00/hr 700.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
11/29/2015	TC	Analyze Defendants MTD statute of limitations arguments in order to respond (1.0); research national case law re: statute of limitations after collective action decertification (2.4)	3.40 200.00/hr	680.00
	TC	Analyze Defendants MTD breach of contract arguments in order to respond (.8); research national case law re: FLSA and state law contract claims (7.8)	8.60 200.00/hr	1,720.00
11/30/2015	TC	Search through previous pleadings to locate and analyze Order re: severance and relation back of statute of limitations to original claim (1.3)	1.30 200.00/hr	260.00
12/1/2015	DRK	continued work and edit of responses to latest motion to dismiss, and for s.j.	6.60 400.00/hr	2,640.00
12/2/2015	CM	Research case law re: FLSA preemption of state law claims re: overtime payment	2.30 225.00/hr	517.50
12/3/2015	TC	Research national case law re: applicable tolling and relation back of SOL between opt-in date and filing of individual complaint (2.2); research 11th Circuit law re: MTD converted into MSJ based on attachment of exhibits and affidavits not included in original complaint (2.3)	4.50 200.00/hr	900.00
	TC	Meeting with DRK re: response to MTD and filing of Rule 56(d) motion (.5); research case law re: filing Rule 56(d) motion when Defendant submits exhibits attached to MTD (2.0)	2.50 200.00/hr	500.00
12/4/2015	TC	Continue to research applicability of a Rule 56(d) motion in response to defendants motion to dismiss with attached exhibits submitted to the Court (3.0); drafting of Plaintiffs response (4.4)	7.40 200.00/hr	1,480.00
12/5/2015	TC	Continue to draft Plaintiff (Artumus) Response to Defendants Motion to Dismiss and Motion for Summary Judgment (6.5)	6.50 200.00/hr	1,300.00
12/6/2015	TC	Continue to draft Plaintiffs Response to Defendants Motion to Dismiss and Motion for Summary Judgment (10.2)	10.20 200.00/hr	2,040.00
12/7/2015	TC	(Artumus) Receipt/review of correspondence from OC re: extension of time for Plaintiffs to file response to defendants motions (.1); draft/file Consent Motion to extend time (.8)	0.90 200.00/hr	180.00
	TC	(Bice) Draft Plaintiffs response to Defendants Motion to Dismiss FLSA claims and breach of contract claim; research GA and 11th Circuit case law re: statute of limitations for state law breach of contract and preemption of FLSA on contract claim (2.9)	2.90 200.00/hr	580.00
	TC	(Caudle) Draft/file Consent Motion to extend Response to Def. Mot. for Summary Judgment (.2)	0.20 200.00/hr	40.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
12/7/2015	TC	(Creekmore) Draft/file Consent Motion for Extension of Time to Response to Def. Mot. to Dismiss(.2)	0.20 200.00/hr	40.00
	TC	(Drake) Draft/file Consent Motion for Extension of Time to Response to Def. Mot. to Dismiss(.2)	0.20 200.00/hr	40.00
	TC	(Haecker) Draft/file Consent Motion for Extension of Time to Response to Def. Mot. to Dismiss(.2)	0.20 200.00/hr	40.00
	TC	(Harris) Draft/file Consent Motion for Extension of Time to Response to Def. Mot. to Dismiss(.2)	0.20 200.00/hr	40.00
	TC	(Reid) Draft/file Consent Motion for Extension of Time to Response to Def. Mot. to Dismiss(.2)	0.20 200.00/hr	40.00
	TC	(Sawadago) Draft/file Consent Motion for Extension of Time to Response to Def. Mot. to Dismiss(.2)	0.20 200.00/hr	40.00
	TC	(Sims) Draft/file Consent Motion for Extension of Time to Response to Def. Mot. to Dismiss(.2)	0.20 200.00/hr	40.00
	TC	(Starr) Draft/file Consent Motion for Extension of Time to Response to Def. Mot. to Dismiss(.2)	0.20 200.00/hr	40.00
	TC	(Bice) Draft/file Consent Motion for Extension of Time to Response to Def. Mot. to Dismiss(.2)	0.20 200.00/hr	40.00
	DRK	continued work on responses to motions to dismiss, motion for summary judgment in Caudle.	7.00 400.00/hr	2,800.00
12/8/2015	TC	(Artumus) Receipt of DRK edits to Plaintiffs Response to Defendants Motion to Dismiss; continue to draft/edit same (3.4)	3.40 200.00/hr	680.00
	TC	Draft/file proposed Order for Extension of Time to Respond to Defendants Motion to Dismiss and Motion for Summary Judgment (.7)	0.70 200.00/hr	140.00
	TC	Research summary judgment standard for breach of contract claim in FLSA context in order to draft motion in response to summary judgment (2.3)	2.30 200.00/hr	460.00
12/9/2015	TC	Continue to draft Plaintiffs Response to Defendants Motion to Dismiss and Declaration of DRK in support of Rule 56(d) (6.2)	6.20 200.00/hr	1,240.00
	CM	Correspondence w. TC re: Youth Villages Research (.5); Analysis of cases in district courts re: summary judgment and FLSA preemption of state law contract claims (2.3)	2.80 225.00/hr	630.00
12/10/2015	TC	(Artumus) Draft affidavit of DRK for Rule 56(d) (1.2); add citation to affidavit in motion and continue to edit motion. (1.0)	3.20 200.00/hr	640.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
12/10/2015	TC (Bice) research breach of contract cause of action separate from FLSA violation (2.0); draft Plaintiffs Response in Opposition to Defendants MTD (5.1)	7.10 200.00/hr	1,420.00
12/11/2015	TC (Caudle) Research summary judgment issues of preemption and 3 year statute of limitations for willfulness under the FLSA, burden of proof on movant (.6); draft response to motion for partial summary judgment (1.2)	1.80 200.00/hr	360.00
	TC (Bice) Research contract cause of action preemption and offer form as valid contract in federal and state law (6.0); continue to draft Plaintiffs Response in Opposition to Defendants MTD (1.2)	7.20 200.00/hr	1,440.00
12/12/2015	TC (Caudle) Research job offer acknowledgement as valid contract and burden of proof of contract at dismissal stage; continue to draft response to motion for partial summary judgment (9.0); draft DRK declaration for rule 56(d) (1.1)	10.10 200.00/hr	2,020.00
12/14/2015	TC (Bice) Receipt/review of DRK edits to Plaintiffs Opposition to Defendants Motion to Dismiss (.8); continue to edit (.7); add citations to DRK declaration (.5)	2.00 200.00/hr	400.00
	TC (Caudle) Receipt/review of DRK edits to Plaintiffs Opposition to Defendants Motion for Partial Summary Judgment; continue to edit; add citations to DRK declaration (2.5)	2.50 200.00/hr	500.00
	TC (Creekmore) Draft/file response to Def. Mot. to Dismiss along with declaration of DRK. (.6)	0.60 200.00/hr	120.00
	TC (Drake) Draft/file response to Def. Mot. to Dismiss along with declaration of DRK. (.6)	0.60 200.00/hr	120.00
	TC (Haecker) Draft/file response to Def. Mot. to Dismiss along with declaration of DRK. (.6)	0.60 200.00/hr	120.00
	TC (Harris) Draft/file response to Def. Mot. to Dismiss along with declaration of DRK. (.6)	0.60 200.00/hr	120.00
	TC (Reid) Draft/file response to Def. Mot. to Dismiss along with declaration of DRK. (.6)	0.60 200.00/hr	120.00
	TC (Sawadogo) Draft/file response to Def. Mot. to Dismiss along with declaration of DRK. (.6)	0.60 200.00/hr	120.00
	TC (Sims) Draft/file response to Def. Mot. to Dismiss along with declaration of DRK. (.6)	0.60 200.00/hr	120.00
	TC (Starr) Draft/file response to Def. Mot. to Dismiss along with declaration of DRK. (.6)	0.60 200.00/hr	120.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
1/4/2016	DRK call and correspondence with Jim Mulroy re future actions, possible mediation (1.0); multiple emails re same (.4); multiple calls to clients re same (1.2); preparation of letter to clients re same (.2)	2.80 400.00/hr	1,120.00
1/6/2016	DRK Preparation of mediation preference form for clients (.6); multiple calls to/from clients re mediation issues (.8); work with SC on offer spreadsheet/chart (1.1).	2.50 400.00/hr	1,000.00
1/12/2016	SC created a chart of liquidated damages owed by Plaintiff's	0.50 85.00/hr	42.50
	DRK Work with Samira on binder for mediation prep containing key docs, orders; (.4)review and edit of draft spreadsheet showing distribution of settlement proceeds (.5)	0.90 400.00/hr	360.00
1/14/2016	SC mailed correspondence to all plaintiff's re scheduled mediation	0.30 85.00/hr	25.50
1/21/2016	DRK Prep of mediation statement for Lee Parks (1.0); calls to/from 4 clients answering questions, discussion mediation (1.3)	2.30 400.00/hr	920.00
1/25/2016	SC created spreadsheet re unpaid overtime	0.50 85.00/hr	42.50
1/27/2016	DRK continued work on settlement spreadsheet/chart (.8); calls to/from multiple clients (1.1)	1.90 400.00/hr	760.00
1/28/2016	DRK Preparation for mediation (.5); email of materials to/from Lee Parks (.6); call with Lee re same (.2)	1.30 400.00/hr	520.00
2/1/2016	DRK final revisions to reply brief in support of s.j.	3.80 400.00/hr	1,520.00
2/2/2016	DRK participation in mediation	8.00 400.00/hr	3,200.00
	TC Review of pleading summary in order to determine date of termination and 2-year statute of limitations period for individual suits where Defendant filed a motion to dismiss (.6)	0.60 200.00/hr	120.00
	DRK Meeting with clients and JB in prep for mediation (1.0); Participation in mediation and settlement of 11 of the cases and outline for settlement for remaining cases (7.6)	8.60 400.00/hr	3,440.00
2/3/2016	DRK Calls to various clients to discuss results a mediation (.8)	0.80 400.00/hr	320.00
2/4/2016	DRK Multiple emails/calls to/from Parks re continued negotiations and attempts to settle (1.2), calls to interested clients re same (.5)	1.70 400.00/hr	680.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
2/5/2016	DRK Emails to/from Lee Parks, Jim Mulroy working on details of settlement, future actions (.7)	0.70 400.00/hr	280.00
2/6/2016	DRK Additional emails to/from Lee and Jim re attempting to finalize settlement (.3)	0.30 400.00/hr	120.00
2/8/2016	DRK Emails to/from Lee and Jim M. re finalizing settlement, and his drafting of settlement agreement (.5); email to Court announcing settlement (.1)	0.60 400.00/hr	240.00
2/11/2016	SC revised drafted mediation agreement	0.30 85.00/hr	25.50
	DRK Email correspondence to/from Jim Mulroy re filling in blanks for mediation statement settlement figures; (.2) o/c with Samira re same (.2); calls to/from 2 clients re their questions (.4)	0.80 400.00/hr	320.00
2/17/2016	DRK Emails to/from Jim re settlement release (.2)	0.30 400.00/hr	120.00
2/18/2016	DRK Receipt and review of release agreement, making of edits re various issues (1.4)emails to Jim M. re same (.2)	1.60 400.00/hr	640.00
2/19/2016	DRK Reciept and review of additional changes to Par. 8 requested by Defendant and email to Jim M. objecting to same (.4)	0.40 400.00/hr	160.00
2/23/2016	DRK Call with Jim M. to resolve differences in settlement agreement (.3); additional edits to release agreement per same (.5) and email to Jim M. re same (.1)	0.90 400.00/hr	360.00
2/25/2016	SC called all plaintiff's re settlement documents and status update	4.00 85.00/hr	340.00
3/2/2016	JB Meeting with B. Artumus regarding settlement documents and amount	0.10 295.00/hr	29.50
3/3/2016	SC email Brown re settlement documents	0.10 85.00/hr	8.50
3/4/2016	SC email Graham re settlement documents	0.10 85.00/hr	8.50
3/7/2016	JB Phone call with A. Davis regarding settlement and release of FLSA case and pending bankruptcy	0.10 295.00/hr	29.50
3/8/2016	SC email Starr re settlement documents	0.10 85.00/hr	8.50
	DRK Emails to/from Court re update (.1)	0.10 400.00/hr	40.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
3/9/2016	SC email Waugh re settlement documents	0.10 85.00/hr	8.50
3/10/2016	SC emailed Hazelwood re settlement and status update	0.10 85.00/hr	8.50
3/11/2016	SC emailed Tramble, Manning, and Gilstrap re settlement documents	0.10 85.00/hr	8.50
3/14/2016	SC emailed Ryan Craft settlement documents	0.10 85.00/hr	8.50
	DRK participation in call with Court re Defendant confidentiality request (.3)	0.30 400.00/hr	120.00
3/18/2016	SC emailed Amber Davis re status update	0.10 85.00/hr	8.50
3/21/2016	JB Confer with SC regarding status of settlement agreement signatures (0.2); review file material for alternative contact information and friends of Mr. Gilstrap (0.1); multiple phone calls with Mr. Booze regarding status of settlement payment (0.1)	0.40 295.00/hr	118.00
3/22/2016	SC sent OC remaining signed settlement releases	0.10 85.00/hr	8.50
	SC emailed and called Charles Burgess and John Gilstrap re settlement documents	0.10 85.00/hr	8.50
3/24/2016	DRK Emails to/from Jim M. re various issues, progress (.3)	0.30 400.00/hr	120.00
3/25/2016	SC sent OC signed settlement releases via email	0.10 85.00/hr	8.50
	DRK Emails to/from Jim re his belief that various individuals are missing, have not signed releases (.4)	0.40 400.00/hr	160.00
3/28/2016	DRK Receipt and review of joint motion for approval and draft order re same; (.8) various emails to Jim M. re same (.5); review of court order denying motion to approve and email to Jim re same (.2)	1.50 400.00/hr	600.00
3/29/2016	DRK Short email to Jim M. re status (.2)	0.20 400.00/hr	80.00
3/30/2016	DRK Participation in conf. call with Court and Jim M. re various issues and Court questions.(.2)	0.20 400.00/hr	80.00
4/4/2016	DRK Short emails with the Court re Foster-Gasden Plaintiff (.2)	0.20 400.00/hr	80.00



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		<u>Hrs/Rate</u>	<u>Amount</u>
4/8/2016	DRK Emails to Jim requesting checks be delivered(.2)	0.20 400.00/hr	80.00
4/14/2016	DRK Meeting with various clients re check distribution, discussion with Mr. Artamus re his confusion about settlement amounts and future actions.(.8)	0.80 400.00/hr	320.00
	For professional services rendered	1446.30	\$363,822.50
	Additional Charges :		
7/8/2013	SS Overnight mail to Jamie Stephenson		23.62
7/18/2013	SS Overnight mail to Phillip Davis		21.62
	SS Overnight mail to Byron Graham		21.62
7/24/2013	SS Overnight mail to/from Crystal Foster-Gadsen		21.62
9/30/2013	SS Westlaw Charges - September, 2013		84.04
10/31/2013	SS WestLaw Charges - October, 2013		121.11
11/25/2013	SS Filing fee paid to United States District Court		400.00
12/2/2013	SS Service of process on Youth Villages, Inc.		65.00
12/31/2013	SS Pacer Online Legal Research 10/01/13-12/31/13		5.60
1/31/2014	SS WestLaw Charges - January, 2014		13.07
2/14/2014	SS Overnight mail to Phillip White		21.28
2/28/2014	SS WestLaw Charges - February, 2014		39.75
3/26/2014	SS Overnight mail to Phillip White		23.33
3/31/2014	SS Pacer Online Research (01/01/14-03/31/14)		75.60
	SS WestLaw Charges - March, 2014		187.25
4/23/2014	SS Witness fee paid to Byron Graham		72.03
	SS Witness fee paid to William Booze		57.92
	SS Witness fee paid to David Thompson		63.52
	SS Professional Video Services		275.00

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			<u>Amount</u>
4/30/2014	SS	WestLaw - April, 2014	35.89
5/7/2014	SS	Transcript of Phillip Davis (Deposition 04/25/14)	251.91
	SS	Transcript of William Booze & Byron Graham (Depositions 04/23/14)	1,239.28
5/8/2014	SS	Transcripts of David R. Thompson and Paul Willoughby (Depositions 04/24/14)	980.97
5/31/2014	SS	WestLaw Legal Research - May, 2014	140.82
6/30/2014	SS	WestLaw - June, 2014	24.94
7/31/2014	SS	Pacer Online Research (04/01/14-06/30/14)	20.40
	SS	WestLaw Charges - July, 2014	2.38
8/1/2014	SS	Professional Consulting Services Rendered by Brek Group	150.00
10/30/2014	SS	Postage - Class Action Mass Mailing	433.32
	SS	Class Action Mass Mailing	270.00
10/31/2014	SS	WestLaw Charges - October, 2014	21.85
11/30/2014	SS	WestLaw Charges - November, 2014	5.62
12/3/2014	SS	Transcript of Eddie Lee Dowdel, Jr. (Deposition 11/20/14)	685.16
12/8/2014	SS	Travel fees for depositions	29.42
12/9/2014	SS	Travel fees for depositions	29.42
12/17/2014	SS	Postage fees	48.00
12/31/2014	SS	WestLaw Charges - December, 2014	25.19
	SS	Pacer Online Research (4Q 2015)	3.90
1/12/2015	SS	Travel to/from Douglasville for client depositions	29.97
1/13/2015	SS	La Qunita Inn	94.30
1/14/2015	SS	La Qunita Inn	200.10
1/20/2015	SS	Overnight mail to Charles River Associates	23.01
1/23/2015	SS	Overnight mail to Charles River Associates	23.01
1/26/2015	SS	Video Teleconference Services for Layonya Pendleton (Deposition 01/26/15)	710.00

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			<u>Amount</u>
1/28/2015	SS	Conference Call Charges	23.52
1/30/2015	SS	Deposition Transcript of Travis Floyd (Deposition 01/14/15)	219.50
1/31/2015	SS	WestLaw Charges - January, 2015	173.98
2/2/2015	SS	Overnight mail to Jackson Lewis	62.94
	SS	Overnight mail to Youth Villages, Inc.	56.80
2/6/2015	SS	Transcript of Latonya Pendleton (Deposition 01/26/15)	644.11
2/12/2015	SS	La Qunita Inn	125.00
2/16/2015	SS	Transcript of Lavon Flood (Deposition 01/12/15)	207.70
	SS	Transcript of Fannie Cham (Deposition 12/08/14)	201.40
	SS	Transcript of Jamie Stephenson (Deposition 12/08/14)	207.60
	SS	Transcript of Steve Reid (Deposition 01/12/15)	209.00
	SS	Transcript of Rebecca Schwam (Deposition 01/12/15)	249.90
	SS	Transcript of Bernard Artimus (Deposition 12/09/14)	165.70
	SS	Transcript of Lamar Hayes (Deposition 12/09/14)	171.40
	SS	Transcript of Steven Liner (Deposition 01/13/15)	130.20
	SS	Transcript of Steven Ventra (Deposition 12/09/14)	244.50
2/25/2015	SS	Professional Services Rendered by Charles River Associates (January, 2015)	7,306.00
2/26/2015	SS	Transcript of Eugene Dorsey, Jr. (Deposition 02/25/15)	546.17
2/27/2015	SS	Courier from Court Reporter - Expedited Transcript	42.55
2/28/2015	SS	WestLaw Charges - February, 2015	54.59
3/16/2015	SS	Video of Bernard Dickson (Deposition 03/06/15)	458.60
3/18/2015	SS	Transcript of Bernard Dickson (Deposition 03/06/15)	679.12
3/31/2015	SS	WestLaw Charges - March, 2015	198.50
4/1/2015	SS	Professional Services Rendered by Charles River Associates	51,346.00
4/20/2015	SS	Overnight mail to Leah Sykes	38.82

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		<u>Amount</u>
4/30/2015	SS WestLaw Charges - April, 2015	200.87
5/31/2015	SS WestLaw Charges - May, 2015	46.78
6/30/2015	SS WestLaw Charges - June, 2015	229.39
	SS Pacer Online Research (04/01/15-06/30/15)	9.80
	SS Professional Services Rendered by Charles River Associates	3,243.00
7/31/2015	SS WestLaw Charges - July, 2015	32.03
8/31/2015	SS WestLaw Charges - August, 2015	74.67
10/31/2015	SS WestLaw Charges - October, 2015	60.99
11/30/2015	SS WestLaw Charges - November, 2015	33.62
12/31/2015	SS WestLaw Charges - December, 2015	318.18
3/7/2016	SS Overnight mail to Kathy McDougale	16.41
	SS Overnight mail to Golden Smith	23.50
	SS Overnight mail to Nicole Stevens	23.38
	SS Overnight mail to Stephen Ventre	16.41
	SS Overnight mail to Portia Manning	25.98
	SS Overnight mail to Starsheema Drake	22.30
	SS Overnight mail to Tahira Sawadogo	36.38
	SS Overnight mail to Paul Willoughby	23.38
3/8/2016	SS Overnight mail to Frederick Hoxie	16.41
	SS Overnight mail to Alton Starr	16.41
	SS Overnight mail from various Plaintiffs	110.45
3/15/2016	SS Overnight mail to Charles Burgess	22.87
	SS Overnight mail to John Gilstrap	22.43
3/30/2016	SS Overnight mail from John Gilstrap	9.46
3/31/2016	SS Pacer Research (1Q 2016)	1.40

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	<u>Amount</u>
Total additional charges	\$75,471.94
Total amount of this bill	<u>\$439,294.44</u>
Balance due	<u><u>\$439,294.44</u></u>